

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

**PLAINTIFF *ePLUS* INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND
REVISED SUMMARY OF THE DEPOSITION OF LYNN S. CIMINO**

Plaintiff, *ePlus*, Inc. ("*ePlus*"), through counsel, hereby submits the following specific objections to Defendant Lawson Software, Inc. ("*Lawson*")'s Counter-Deposition Designations of the deposition of Lynn Cimino and offers the following counter-counter designations and revised summary:

Specific Objections

Defendant's Counter Designations	<i>ePlus</i>'s Objections to Defendant's Counter Designations	<i>ePlus</i>'s Counter-Counter Designations
14:9-11		
29:1-3		29:8-14
29:15-19		
30:5-9	602	
33:17-18		
34:9-22		
45:5-18	602	
62:5-8		
73:15-20		

Defendant's Counter Designations	<i>e</i>Plus's Objections to Defendant's Counter Designations	<i>e</i>Plus's Counter-Counter Designations
84:8-12	602	
153:3-16	602	
154:10-22	602	

Revised Summary

Designated testimony relates to:

Ms. Cimino is the Financial Services Manager at South Jersey Healthcare System (“SJHS”). (15:17-19) Her responsibilities include managing all of the non-clinical financial systems for the hospital. (15:20-16:2)

SJHS currently licenses the Inventory Control, Requisitions, Purchase Order, and EDI modules and Requisitions Self-Service application from Lawson. (13:7-11; 13:21-14:8) SJHS intends to do away with paper requisitions and create electronic requisitions using Requisitions Self-Service once it is implemented. (68:3-8)

The current Lawson S3 system used by SJHS was implemented between June and November of 2008. (23:14-21) Lawson provided onsite consultants at SJHS that assisted with the implementation of the system. (23:22-25) One of the consultants, Henry Reinhard, was a dedicated materials analyst that provided training on the functionality of the system. (24:15-25:8) He also helped with the data conversion for the Item Master. *Id.* SJHS obtained PDF versions of Lawson user manuals from Lawson, including user guides for the Inventory Control, Requisitions, and Purchase Order modules as well as the Requisitions Self-Service application. (12:3-13:1)

The Lawson S3 system item master at SJHS include gloves, gowns, masks, lotion, toothpaste, diapers, computer paper, and other equipment. (20:10-23) Some of the larger vendors for SJHS include Owens & Minor, Cardinal, and Medline. (22:2-10) Information found in the Item Master at SJHS includes item numbers, vendor information, units of measure, whether an item is a stock or non-stock item, item descriptions, and vendor part numbers but not item images. (18:25-19:6; 60:20-61:4; 61:16-62:4)

The information in SJHS’s Item Master was initially uploaded using Microsoft add-ins but is not manually keyed in. (19:7-11) Lawson was not primarily responsible for importing the information through the add-ins, but provided onsite training to SJHS on using the Microsoft add-ins to upload data onto the Item Master. (19:12-20:9) The responsibility for Item Master management, which includes putting items into the Item Master and deleting items from the Item Master, was shared between Lawson and SJHS, but was ultimately SJHS’s.¹ (39:23-40:19) Lawson also shared responsibility with SJHS for the implementation of system functionality for the requisition of goods and services and was responsible for assisting SJHS with the data migration and conversion. (40:20-42:1) Lawson assisted SJHS in formatting, error checking, and running the APIs as part of the data conversion process. (43:20-24) Lawson provided work sessions on data migration. (44:16-45:4) The data conversion was verified and validated jointly by Lawson and SJHS. (45:25-46:9)

¹ Lawson contends that the sentence should read, “The responsibility for Item Master management . . . was ultimately SJHS’s.” ePlus objects that this sentence disregards the witness’s testimony that the responsibility was shared between SJHS and Lawson.

The Lawson S3 system licensed by SJHS includes the functionality to search for items by item number, item description, universal product code, and manufacturer code. (30:10-14; 128:10-129:25) It also includes the capability of automatically generating multiple purchase orders for non-stock items from a single requisition. (57:8-13; 124:1-12) A single item in the Item Master can be set up to be ordered from two different vendors. (73:21-74:15; 75:4-76:3) A requisition could be created for the item from either vendor. *Id.*

Lawson has a maintenance agreement with SJHS that covers support of the applications, including access to Lawson's knowledge base and the ability to enter support tickets. (33:1-6) The license for the Lawson S3 software is paid for on an annual basis. (35:17-36:3) SJHS is only permitted to modify the Lawson software to the extent permitted under an order form or as described in the product documentation. (80:5-81:11)

Ms. Cimino provided a recorded demonstration of the Lawson S3 software used at SJHS. (90:8-100:10; 101:15-105:12; 106:17-108:19; 112:4-116:3; 125:15-132:4; 132:6-134:8; 134:17-21; 135:9-16; 135:21-138:2; 142:5-23; 153:17-154:4; 155:4-12) Ms. Cimino demonstrated searching for items from different manufacturers (e.g., copier paper, gloves, lotion, diapers, gowns) and building requisitions for those items using the "search catalog" feature in Requisitions Self-Service as well as the RQ10 program in the Requisitions module. *Id.* Within the RQ10 program, Ms. Cimino demonstrated how to search for items by item description and manufacturer code. *Id.*

Respectfully submitted,

/s/

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Dated: August 11, 2010

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4 -----</p> <p>5 ePLUS INC.,) Civil Action</p> <p>6 Plaintiff,) No. 3:09-CV-620 (JRS)</p> <p>7 vs.)</p> <p>8 LAWSON SOFTWARE, INC.,)</p> <p>9 Defendant.)</p> <p>10 -----</p> <p>11</p> <p>12</p> <p>13</p> <p>14 Videotaped Deposition of</p> <p>15 LYNN S. CIMINO</p> <p>16 Bridgeton, New Jersey</p> <p>17 Tuesday, March 2, 2010</p> <p>18 9:58 a.m.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Job No.: 24-174475</p> <p>24 Pages: 1 - 158</p> <p>25 Reported by: Elizabeth M. Kondor, CCR, CLR</p>	<p>3</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 ON BEHALF OF PLAINTIFF:</p> <p>4 MICHAEL STRAPP, ESQUIRE</p> <p>5 -and-</p> <p>6 JAMES D. CLEMENTS, ESQUIRE</p> <p>7 Goodwin Procter, LLP</p> <p>8 53 State Street</p> <p>9 Exchange Place</p> <p>10 Boston, Massachusetts 02109</p> <p>11 (617) 570-1000</p> <p>12</p> <p>13 ON BEHALF OF DEFENDANT:</p> <p>14 JOSHUA P. GRAHAM, ESQUIRE</p> <p>15 Merchant & Gould, P.C.</p> <p>16 3200 IDS Center</p> <p>17 80 South Eighth Street</p> <p>18 Minneapolis, Minnesota 55402-2215</p> <p>19 (612) 332-5300</p> <p>20</p> <p>21 ON BEHALF OF THE WITNESS AND SOUTH JERSEY</p> <p>22 HEALTHCARE:</p> <p>23 MIKOLE BURKE-ANDERSON, ESQUIRE</p> <p>24</p> <p>25 2950 College Drive - Suite 1E</p> <p>26 Vineland, New Jersey 08360</p> <p>27 (856) 641-8632</p> <p>28</p> <p>29 ALSO PRESENT:</p> <p>30 MIKE CILIBERTI, Video Specialist</p>
<p>2</p> <p>1</p> <p>2 VIDEOTAPED DEPOSITION OF</p> <p>3 LYNN S. CIMINO</p> <p>4</p> <p>5</p> <p>6</p> <p>7 Held in the offices of:</p> <p>8 Department of Human Resources</p> <p>9 South Jersey Healthcare</p> <p>10 333 Irving Avenue</p> <p>11 Bridgeton, New Jersey</p> <p>12</p> <p>13</p> <p>14 Taken pursuant to Federal Rules of Civil</p> <p>15 Procedure, before Elizabeth M. Kondor, CCR, CLR</p> <p>16 and Notary Public in and for the State of New</p> <p>17 Jersey, who officiated in administering the oath</p> <p>18 to the witness.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 EXAMINATION INDEX</p> <p>2</p> <p>3 WITNESS PAGE</p> <p>4 LYNN S. CIMINO</p> <p>5 Examination by Mr. Strapp.....7</p> <p>6 Examination by Mr. Graham.....141</p> <p>7 Further Examination by Mr. Strapp.....152</p> <p>8 Further Examination by Mr. Graham.....154</p> <p>9</p> <p>10 EXHIBIT INDEX</p> <p>11 (Exhibits attached.)</p> <p>12 EXHIBIT DESCRIPTION PAGE</p> <p>13 South Jersey 1 Subpoena for Production</p> <p>14 of Documents.....9</p> <p>15 South Jersey 2 Subpoena to Testify at</p> <p>16 a deposition.....9</p> <p>17 South Jersey 3 Document entitled</p> <p>18 "Instructions".....9</p> <p>19 South Jersey 4 Document entitled</p> <p>20 "Lawson Professional</p> <p>21 Services Statement of</p> <p>22 Work for South Jersey</p> <p>23 Health System, Inc."</p> <p>24 (SJH000002 - 84).....36</p> <p>25</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>5</p> <p>1 EXHIBITS CONTINUED</p> <p>2 EXHIBIT DESCRIPTION PAGE</p> <p>3 South Jersey 5 Informal RFP Requests</p> <p>4 and Lawson's Response</p> <p>5 (SJH000115 - 141).....51</p> <p>6 South Jersey 6 Inventory Control User</p> <p>7 Guide Version 9.0.1</p> <p>8 (L0032249 - 549).....70</p> <p>9 South Jersey 7 Purchase Order User</p> <p>10 Guide Version 9.0.1</p> <p>11 (L0052019 - 296).....72</p> <p>12 South Jersey 8 Product order forms</p> <p>13 and Master Terms and</p> <p>14 Conditions Agreement</p> <p>15 with Lawson</p> <p>16 (SJH000099 - 114).....78</p> <p>17 South Jersey 9 Follow-on Proposal from</p> <p>18 Lawson in response to</p> <p>19 the RFP</p> <p>20 (SJH000142 - 191).....81</p> <p>21 South Jersey 10 Lawson Requisitions</p> <p>22 Self-Service User Guide</p> <p>23 Version 9.0.1</p> <p>24 (L0045474 - 553).....84</p> <p>25 South Jersey 11 Recording of Demonstration...155</p>	<p>7</p> <p>1 L Y N N S. C I M I N O, having been first duly</p> <p>2 sworn, testified as follows:</p> <p>3 EXAMINATION BY MR. STRAPP:</p> <p>4 Q. Good morning, Ms. Cimino.</p> <p>5 A. Good morning.</p> <p>6 Q. Have you ever had a deposition taken</p> <p>7 before?</p> <p>8 A. No.</p> <p>9 Q. Today I'm going to be asking you</p> <p>10 questions and you will provide answers. If</p> <p>11 there's ever an instance where you don't</p> <p>12 understand my question, can you please let me</p> <p>13 know?</p> <p>14 A. Yes.</p> <p>15 Q. And if you answer my question, I'll</p> <p>16 assume that you understood it; is that fair?</p> <p>17 A. Yes.</p> <p>18 Q. The court reporter is going to be</p> <p>19 taking down our questions and answers today on a</p> <p>20 written transcript, so you'll need to answer</p> <p>21 audibly to my questions.</p> <p>22 Does that make sense?</p> <p>23 A. Yes.</p> <p>24 Q. How did you prepare for this</p> <p>25 deposition today?</p>
<p>6</p> <p>1 VIDEOGRAPHER: Here begins Videotape</p> <p>2 No. 1 in the deposition of Lynn Cimino in the</p> <p>3 matter of ePlus, Incorporated versus Lawson</p> <p>4 Software, Incorporated, in the US District Court,</p> <p>5 for the Eastern District of Virginia, Case No.</p> <p>6 309-CV-620. Today's date is March 2, 2010 and the</p> <p>7 time on the video monitor is 9:58 a.m.</p> <p>8 The video operator today is Mike</p> <p>9 Ciliberti, and this videotape deposition is taking</p> <p>10 place at 333 Irving Avenue, Bridgeton, New Jersey.</p> <p>11 Counsel, please voice identify</p> <p>12 yourselves and state whom you represent.</p> <p>13 MR. STRAPP: Michael Strapp,</p> <p>14 representing the plaintiff, ePlus.</p> <p>15 MR. CLEMENTS: James Clements,</p> <p>16 representing plaintiff, ePlus.</p> <p>17 MR. GRAHAM: Joshua Graham,</p> <p>18 representing defendant, Lawson Software.</p> <p>19 MS. BURKE-ANDERSON: Mikole</p> <p>20 Burke-Anderson, associate general counsel, South</p> <p>21 Jersey Healthcare.</p> <p>22 VIDEOGRAPHER: Would the reporter</p> <p>23 please swear in the witness.</p> <p>24</p> <p>25</p>	<p>8</p> <p>1 A. I did Google ePlus and Lawson to find</p> <p>2 out what this might pertain to, and that's</p> <p>3 honestly about it, because I didn't have a whole</p> <p>4 lot of direction as to what may be asked of me.</p> <p>5 Q. Okay. And are you being represented</p> <p>6 here by Ms. Mikole Burke-Anderson?</p> <p>7 A. I don't think I'm actually</p> <p>8 represented by anybody.</p> <p>9 MS. BURKE-ANDERSON: You are not.</p> <p>10 MR. STRAPP: Okay.</p> <p>11 THE WITNESS: Okay.</p> <p>12 MS. BURKE-ANDERSON: As we are not a</p> <p>13 party to this lawsuit.</p> <p>14 THE WITNESS: Okay.</p> <p>15 MR. STRAPP: Okay.</p> <p>16 Q. Did you meet with Ms. Burke-Anderson</p> <p>17 to prepare for the deposition?</p> <p>18 A. No.</p> <p>19 Q. And did you speak with Mr. Graham</p> <p>20 from Merchant & Gould to prepare for the</p> <p>21 deposition?</p> <p>22 A. No.</p> <p>23 Q. Did you review any documents to</p> <p>24 prepare for the deposition?</p> <p>25 A. I provided documents to Mikole based</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>9</p> <p>1 on her request.</p> <p>2 Q. Okay. And how did you go about</p> <p>3 collecting those documents for Mikole?</p> <p>4 A. They're documents that I had when we</p> <p>5 signed the contracts with Lawson Software, so they</p> <p>6 were items that I already had.</p> <p>7 Q. And did you collect those documents</p> <p>8 based on her direction about what the subpoena was</p> <p>9 requesting?</p> <p>10 A. No. I had those documents as part of</p> <p>11 our signing with Lawson.</p> <p>12 MR. STRAPP: Can I mark these as</p> <p>13 Exhibits South Jersey 1 through South Jersey 3,</p> <p>14 please.</p> <p>15 (Exhibits South Jersey 1 through</p> <p>16 South Jersey 3 were received and marked for</p> <p>17 identification.)</p> <p>18 Q. Do you understand that the testimony</p> <p>19 that you're going to be providing today here is</p> <p>20 under oath testimony?</p> <p>21 A. Yes.</p> <p>22 Q. And is there anything that would</p> <p>23 prevent you today from giving full, complete and</p> <p>24 honest answers to my questions?</p> <p>25 A. No.</p>	<p>11</p> <p>1 are a list of 11 topics there for the deposition.</p> <p>2 If you could take a moment to review</p> <p>3 them and let me know if there are any topics that</p> <p>4 you're not prepared to testify about today?</p> <p>5 A. Okay.</p> <p>6 Can I get a definition of what Lawson</p> <p>7 Electronic Sourcing means to you?</p> <p>8 Q. To me, that would refer to any of the</p> <p>9 software modules involved in the Lawson S3</p> <p>10 Software Suite?</p> <p>11 A. Okay. Then I feel comfortable</p> <p>12 answering these questions, noting we don't have</p> <p>13 the punchout application.</p> <p>14 Q. Okay.</p> <p>15 A. So I can only speak to the actual</p> <p>16 modules that we do have here.</p> <p>17 Q. Okay. Could you turn, please, now to</p> <p>18 page 12 of that document that we're looking at,</p> <p>19 Exhibit South Jersey 3, which is a schedule of</p> <p>20 topics and requests for production of documents.</p> <p>21 And my question is whether there are</p> <p>22 any documents in the possession of South Jersey</p> <p>23 that are responsive to these requests that have</p> <p>24 not yet been produced to ePlus?</p> <p>25 A. I provided the contracts and our</p>
<p>10</p> <p>1 Q. The court reporter has just handed</p> <p>2 you what have been marked as South Jersey Exhibits</p> <p>3 1 through 3.</p> <p>4 Have you seen any of these documents</p> <p>5 before?</p> <p>6 A. No.</p> <p>7 Q. Okay. I'll represent to you that</p> <p>8 these are copies of subpoenas and schedules of</p> <p>9 instructions that were served by ePlus on South</p> <p>10 Jersey.</p> <p>11 Do you understand that you are here</p> <p>12 today representing South Jersey in response to the</p> <p>13 subpoena for deposition testimony that was served</p> <p>14 by ePlus?</p> <p>15 A. Yes.</p> <p>16 Q. And are you prepared today to provide</p> <p>17 testimony on behalf of South Jersey regarding the</p> <p>18 deposition topics that ePlus is seeking testimony</p> <p>19 about?</p> <p>20 A. I believe so. I don't know what</p> <p>21 those topics are yet, but...</p> <p>22 Q. Okay. So why don't we take a moment</p> <p>23 to look and review Exhibit South Jersey 3, which</p> <p>24 is entitled "Instructions." And if you could turn</p> <p>25 to page 10 of that document, you'll see that there</p>	<p>12</p> <p>1 software license. I did not provide any user</p> <p>2 manuals.</p> <p>3 Q. And does South Jersey have in its</p> <p>4 possession any Lawson user manuals?</p> <p>5 A. I have downloads of their user</p> <p>6 manuals, like, in PDF format, not printed</p> <p>7 versions.</p> <p>8 Q. Okay. Do you know which user manuals</p> <p>9 are in PDF format that you have?</p> <p>10 A. I have probably most of them. I have</p> <p>11 the procurement, I have the inventory control, I</p> <p>12 have the other applications, which I guess you're</p> <p>13 not really interested in, HR, accounts payable,</p> <p>14 invoice matching, that type of stuff.</p> <p>15 Q. Do you have the Requisitions User</p> <p>16 Guide?</p> <p>17 A. I believe so.</p> <p>18 Q. Do you have the Inventory Control</p> <p>19 User Guide?</p> <p>20 A. Yes.</p> <p>21 Q. Does South Jersey have in its</p> <p>22 possession, the Purchase Order User Guide?</p> <p>23 A. Yes.</p> <p>24 Q. Does South Jersey have the</p> <p>25 Requisitions Self-Service User Guide?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>13</p> <p>1 A. Yes.</p> <p>2 Q. Are there any other documents that</p> <p>3 are listed in this Schedule B that South Jersey</p> <p>4 has in its possession, but that have not yet been</p> <p>5 provided to ePlus?</p> <p>6 A. I don't believe so.</p> <p>7 Q. What software does South Jersey</p> <p>8 currently license from Lawson?</p> <p>9 A. The purchase order module, the</p> <p>10 requisition self-service, inventory control,</p> <p>11 invoice matching.</p> <p>12 Q. Anything else?</p> <p>13 A. Do you want me to go through, like,</p> <p>14 the human resources applications?</p> <p>15 Q. You don't need to go through the</p> <p>16 particular module, but does South Jersey also</p> <p>17 license the Human Resources Suite?</p> <p>18 A. We do. We license -- it's fully RP,</p> <p>19 so we have the financial module, the human</p> <p>20 resource module, including payroll and benefits.</p> <p>21 Q. And what particular software</p> <p>22 applications does South Jersey license from Lawson</p> <p>23 that relate to procurement?</p> <p>24 A. The purchase order, inventory</p> <p>25 control, requisition self-service, invoice</p>	<p>15</p> <p>1 believe that was it, because I think we had the</p> <p>2 invoice matching, even though it wasn't being</p> <p>3 used, but that may be new. I'd really have to look</p> <p>4 at the software license agreement that was signed</p> <p>5 in '08 to know for sure.</p> <p>6 Q. And before South Jersey upgraded its</p> <p>7 software in April of '08, had it also already</p> <p>8 licensed older versions of purchase order from</p> <p>9 Lawson?</p> <p>10 A. Yes.</p> <p>11 Q. And was it already licensing, at that</p> <p>12 point, EDI from Lawson?</p> <p>13 A. Yes.</p> <p>14 Q. And was it already licensing</p> <p>15 inventory control from Lawson?</p> <p>16 A. Yes.</p> <p>17 Q. What is your current title at South</p> <p>18 Jersey?</p> <p>19 A. I'm the financial systems manager.</p> <p>20 Q. And what kind of responsibilities do</p> <p>21 you have in that role?</p> <p>22 A. I manage all of the financial</p> <p>23 systems, the nonclinical financial systems, for</p> <p>24 the hospital. Lawson is one major area of</p> <p>25 responsibility, in addition to Sorian for our</p>
<p>14</p> <p>1 matching.</p> <p>2 Q. Are these -- are those software</p> <p>3 applications all part of the Lawson S3 Software</p> <p>4 Suite?</p> <p>5 A. Yes.</p> <p>6 Q. Does South Jersey license EDI from</p> <p>7 Lawson?</p> <p>8 A. Yes, we do, sorry.</p> <p>9 Q. And has South Jersey at any point in</p> <p>10 time licensed procurement punchout from Lawson?</p> <p>11 A. No.</p> <p>12 Q. When was the -- when did South Jersey</p> <p>13 first license any of the procurement software from</p> <p>14 Lawson?</p> <p>15 A. South Jersey had a very old version</p> <p>16 of Lawson that was licensed in -- honestly, I'm</p> <p>17 not positive. It's -- several years ago, we</p> <p>18 confined that original contract. I don't know.</p> <p>19 We recently upgraded from that version to Version</p> <p>20 9 in -- I guess April of '08 is when those</p> <p>21 contracts were signed.</p> <p>22 Q. And in April of '08, did Lawson -- I</p> <p>23 mean, did South Jersey license any new procurement</p> <p>24 modules that it did not have at that point?</p> <p>25 A. Requisition self-service, and I</p>	<p>16</p> <p>1 scheduling, our registration and our billing</p> <p>2 systems.</p> <p>3 Q. And is there -- are there any</p> <p>4 employees of South Jersey that work under your</p> <p>5 direction?</p> <p>6 A. Yes. I have five direct reports.</p> <p>7 Q. And what kind of responsibilities do</p> <p>8 those reports have?</p> <p>9 A. Two of those employees currently</p> <p>10 support Lawson, two are working on the Sorian side</p> <p>11 and one is kind of working with our electronic</p> <p>12 medical record implementation.</p> <p>13 Q. What are the names of the employees</p> <p>14 who support the Lawson Software?</p> <p>15 A. Matthew Daph and Gene Goss. Both are</p> <p>16 new employees to South Jersey Health System after</p> <p>17 the implementation of Lawson.</p> <p>18 Q. And do they have specific areas of</p> <p>19 responsibility with respect to the Lawson</p> <p>20 Software?</p> <p>21 A. Matthew primarily handles the HR</p> <p>22 payroll. Gene primarily handles the invoice</p> <p>23 matching and the procurement applications. Gene</p> <p>24 has been employed with us for two months and would</p> <p>25 not be able to speak.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>17</p> <p>1 Q. Are -- who is permitted at South</p> <p>2 Jersey to utilize the Procurement Suite of</p> <p>3 software from Lawson?</p> <p>4 A. All of our employees in the materials</p> <p>5 management department have different</p> <p>6 responsibilities, our buyers, our warehouse and</p> <p>7 storeroom personnel, our accounts payable</p> <p>8 department, with regard to invoice matching. Then</p> <p>9 there's IT personnel who had access to the</p> <p>10 information as well.</p> <p>11 Q. Approximately how many employees are</p> <p>12 there in the materials management department at</p> <p>13 South Jersey?</p> <p>14 A. There's less than 50. I could get</p> <p>15 you an accurate count. I honestly don't know.</p> <p>16 Q. How long have you been working with</p> <p>17 Lawson Software?</p> <p>18 A. Since April of '08.</p> <p>19 Q. And how long have you been employed</p> <p>20 by South Jersey?</p> <p>21 A. Twenty years.</p> <p>22 Q. Who was responsible for the Lawson</p> <p>23 Software applications at South Jersey prior to</p> <p>24 April of '08?</p> <p>25 A. There was a materials analyst who</p>	<p>19</p> <p>1 in the Item Master?</p> <p>2 A. You have -- what we call the Lawson</p> <p>3 number is the item number, you have the vendor</p> <p>4 information, unit of measure, whether it's a stock</p> <p>5 or nonstock type item, the description of the</p> <p>6 item, secondary description of the item.</p> <p>7 Q. And how is that information imported</p> <p>8 into the Item Master?</p> <p>9 A. Now, it's manually keyed in there.</p> <p>10 Initially, we uploaded it through the Microsoft</p> <p>11 add-ins.</p> <p>12 Q. Did Lawson assist in that process of</p> <p>13 the importation of the information through the</p> <p>14 Microsoft add-ins?</p> <p>15 A. We had consultants on site who may</p> <p>16 have assisted, but we were trained in how to use</p> <p>17 the add-ins, so we primarily did that ourselves.</p> <p>18 Q. And who provided South Jersey with</p> <p>19 the training on how to use the add-ins; was that</p> <p>20 Lawson personnel?</p> <p>21 A. Yes.</p> <p>22 Q. Were those employees of the Lawson</p> <p>23 Professional Services Group?</p> <p>24 A. Yes.</p> <p>25 Q. And was that training provided on</p>
<p>18</p> <p>1 primarily supported that, who no longer works with</p> <p>2 South Jersey.</p> <p>3 Q. Are you familiar with the term Item</p> <p>4 Master?</p> <p>5 A. Yes.</p> <p>6 Q. And do you know approximately how</p> <p>7 many items are available in the Item Master that</p> <p>8 South Jersey has on its Lawson Software?</p> <p>9 A. No. I know we did a major cleansing</p> <p>10 prior to Go Live on our Version 9 and cut that</p> <p>11 number down dramatically. I could find that out</p> <p>12 for you, but I wouldn't want to hedge a guess.</p> <p>13 Q. Okay. Do you know whether it's more</p> <p>14 or less than 10,000 items?</p> <p>15 A. Less than 10,000, I would say.</p> <p>16 Q. Would you say more or less than 5,000</p> <p>17 items?</p> <p>18 A. No, I don't want to guess.</p> <p>19 Q. Okay. Do you know approximately how</p> <p>20 many different vendors South Jersey uses within</p> <p>21 the Lawson procurement system?</p> <p>22 A. Just procurement vendors?</p> <p>23 Q. Yes.</p> <p>24 A. No.</p> <p>25 Q. What types of item data are included</p>	<p>20</p> <p>1 site at South Jersey?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know approximately how long</p> <p>4 the training lasted for?</p> <p>5 A. It wasn't a formal training class.</p> <p>6 We had the consultants on site, so it was kind of</p> <p>7 more like a work session as needed with different</p> <p>8 things, so there were various consultants at</p> <p>9 different times.</p> <p>10 Q. What type of products are available</p> <p>11 in the Lawson System at South Jersey, like, for</p> <p>12 example, are there surgical gloves, stents; what</p> <p>13 type of items are available in the Item Master?</p> <p>14 A. There's a variety of items. There</p> <p>15 are gloves, there are gowns, there's masks,</p> <p>16 there's lotion, toothpaste, diapers, a lot of</p> <p>17 equipment. I don't really know what it's used</p> <p>18 for, but patient care related.</p> <p>19 Q. Are there also office supplies</p> <p>20 available in the Item Master?</p> <p>21 A. Office supplies are not. There may</p> <p>22 be some computer paper, stuff like that, nonstock</p> <p>23 items, that are in there.</p> <p>24 Q. Okay. And are most of the items</p> <p>25 nonstock items or are they Lawson -- are they</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>21</p> <p>1 South Jersey inventory that are available in the</p> <p>2 Item Master?</p> <p>3 A. I don't know a breakdown of the two.</p> <p>4 I would say that there's probably more nonstock</p> <p>5 items in there than inventory, but that would be a</p> <p>6 guess.</p> <p>7 Q. Does South Jersey maintain its own</p> <p>8 inventory of items in stock?</p> <p>9 A. Yes.</p> <p>10 Q. And are the personnel in the</p> <p>11 Materials Management Group at South Jersey</p> <p>12 permitted to order nonstock items from vendors</p> <p>13 using the Lawson System?</p> <p>14 A. Yes.</p> <p>15 Q. And do they need to receive approval</p> <p>16 from manager level employees before those</p> <p>17 requisitions can be approved?</p> <p>18 A. The buyers themselves -- our process</p> <p>19 here is, whoever is requesting it would get</p> <p>20 management approval, so if I was requesting</p> <p>21 something from IS, I would have my IS management</p> <p>22 approval, so by the time it went to the buyer,</p> <p>23 they would already have the approvals, they</p> <p>24 wouldn't really be seeking any materials</p> <p>25 management approval to order that item, if that</p>	<p>23</p> <p>1 A. Blue Horseshoe.</p> <p>2 Q. And how long did that process of the</p> <p>3 installation of the software take?</p> <p>4 A. We had a test environment done in</p> <p>5 production, so we had two weeks time, pretty much</p> <p>6 one for each environment.</p> <p>7 Q. Once the two-week period was over,</p> <p>8 the system went live with the new software</p> <p>9 version?</p> <p>10 A. No. The system was ready for us to</p> <p>11 start working with the consultants to build it, to</p> <p>12 test it, to go live.</p> <p>13 Q. I see.</p> <p>14 A. It was implemented -- installed in</p> <p>15 June of '08; we went live with materials and</p> <p>16 finance November 1st of '08; HR payroll, January</p> <p>17 1st of '09.</p> <p>18 Q. So between June of '08 and November</p> <p>19 of '08, was an implementation period after the new</p> <p>20 software was installed?</p> <p>21 A. Yes.</p> <p>22 Q. And during that implementation period</p> <p>23 were there Lawson personnel that were on site here</p> <p>24 in Bridgeton, New Jersey at South Jersey?</p> <p>25 A. Yes.</p>
<p>22</p> <p>1 answers the question you're asking.</p> <p>2 Q. Is it possible for you to determine</p> <p>3 who the largest vendors are that -- the vendors</p> <p>4 who supply the most goods in your Item Master; are</p> <p>5 you aware of that information?</p> <p>6 A. I would say Owens & Minor is one of</p> <p>7 our prime vendors.</p> <p>8 Q. Okay. Any other prime vendors that</p> <p>9 you can think of?</p> <p>10 A. Cardinal, and perhaps Medline.</p> <p>11 Q. What services did Lawson provide for</p> <p>12 South Jersey when South Jersey upgraded its</p> <p>13 software in April of 2008; what installation and</p> <p>14 implementation services?</p> <p>15 A. Lawson actually contracted with a</p> <p>16 third party for the installation of the</p> <p>17 applications and all of that software. Lawson</p> <p>18 provided consulting services to us, which</p> <p>19 consisted of training, more of a work session type</p> <p>20 environment, not really formal training classes.</p> <p>21 Everything was done on our facility. We didn't go</p> <p>22 out to any formal Lawson training.</p> <p>23 Q. Who was the third party that Lawson</p> <p>24 contracted with for the installation of the</p> <p>25 applications and the software?</p>	<p>24</p> <p>1 Q. And do you know approximately how</p> <p>2 many Lawson personnel were here at South Jersey</p> <p>3 during that period from June of '08 through</p> <p>4 November of '08?</p> <p>5 A. The total number of people that we</p> <p>6 had or --</p> <p>7 Q. Yes, the total number.</p> <p>8 A. I believe we had seven different</p> <p>9 consultants that came and went through that time.</p> <p>10 There was one dedicated materials analyst, one for</p> <p>11 finance. It ended up being two for HR payroll,</p> <p>12 because they switched. We had to bring in another</p> <p>13 one to do invoice matching. And then there were</p> <p>14 some assistant consultants brought in.</p> <p>15 Q. Do you recall the name of the</p> <p>16 dedicated materials analyst from Lawson that was</p> <p>17 here during the implementation phase?</p> <p>18 A. Yes.</p> <p>19 Q. What was the name?</p> <p>20 A. Henry Reinhard.</p> <p>21 Q. And what kind of tasks was Henry</p> <p>22 Reinhard performing during that implementation</p> <p>23 period from June of '08 through November of '08?</p> <p>24 A. He provided training on the system,</p> <p>25 functionality. He helped with data conversion,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>25</p> <p>1 what we needed to do when, kind of a step by</p> <p>2 step --</p> <p>3 (Interruption by the court reporter.)</p> <p>4 A. He provided training, the</p> <p>5 functionality, how to use the system, the order in</p> <p>6 which we needed to implement things, you know, how</p> <p>7 stuff builds on the next. He provided staff</p> <p>8 training sessions.</p> <p>9 Q. And I think you mentioned data</p> <p>10 conversion as well?</p> <p>11 A. He didn't really do the data</p> <p>12 conversion, but he would assist if there were</p> <p>13 questions on how Lawson 724 now converts to Lawson</p> <p>14 9. That was our upgrade, so it was a major</p> <p>15 upgrade, missing one of Lawson's major releases,</p> <p>16 though.</p> <p>17 Q. What was involved in the process of</p> <p>18 converting the data from the Lawson 724 System to</p> <p>19 the Lawson 9 System with respect to the Supply</p> <p>20 Chain Management Suite?</p> <p>21 A. There was a cleansing of the Item</p> <p>22 Master to get rid of items that were no longer</p> <p>23 used. There was a vendor merging, if you will.</p> <p>24 Prior to Lawson 9, we didn't have a</p> <p>25 fully-integrated system, so our vendors that were</p>	<p>27</p> <p>1 involved?</p> <p>2 A. Yes.</p> <p>3 Q. And can you recall what was the</p> <p>4 process involved for the data conversion to the</p> <p>5 Item Master for the Lawson 9 software?</p> <p>6 A. The Item Master that was in the</p> <p>7 Lawson 724 environment was dumped out and it was</p> <p>8 looked through to find the items that needed to be</p> <p>9 removed. Once they were confident on what items</p> <p>10 they then wanted to have in the new Lawson 9 Item</p> <p>11 Master, that was uploaded via the add-ins.</p> <p>12 Q. And how was Lawson involved in that</p> <p>13 process of converting data for the Item Master for</p> <p>14 the Lawson 9 software?</p> <p>15 A. They provided assistance on field</p> <p>16 values. They did not perform the conversion.</p> <p>17 Q. Were there any Lawson APIs that were</p> <p>18 used during that process of the data conversion?</p> <p>19 A. If the add-ins used APIs, then yes.</p> <p>20 Q. Okay. Now, the data that was already</p> <p>21 in the Item Master from the earlier version of</p> <p>22 Lawson, Lawson 724, how had that data come to be</p> <p>23 in the earlier version of the Item Master?</p> <p>24 A. How was it initially populated?</p> <p>25 Q. Exactly.</p>
<p>26</p> <p>1 in materials had different numbers in instances</p> <p>2 from the vendors that were in our accounts payable</p> <p>3 system, so since it was becoming one system, we</p> <p>4 needed to merge those vendors together, so that</p> <p>5 was a major undertaking. There was -- whatever</p> <p>6 was new to Lawson 9, that needed to be populated.</p> <p>7 You know, like, we have requesting locations that</p> <p>8 tie back to GL categories. All of that had to be</p> <p>9 worked. All of the account numbers that items</p> <p>10 would be expensing against needed to be reworked,</p> <p>11 because with bringing GL onto the system as well,</p> <p>12 there was a whole new chart of account structure.</p> <p>13 Q. Does GL stand for general ledger?</p> <p>14 A. Yes.</p> <p>15 Invoice matching was a completely new</p> <p>16 application for us, so all of that set-up needed</p> <p>17 to be done.</p> <p>18 Q. You mentioned that there was much</p> <p>19 that was new to Lawson 9 that needed to be</p> <p>20 populated.</p> <p>21 Did that include populating the Item</p> <p>22 Master of the procurement for the Procurement</p> <p>23 Suite?</p> <p>24 A. The Item Master wasn't new.</p> <p>25 Q. Okay. Was there a data conversion</p>	<p>28</p> <p>1 A. I don't know.</p> <p>2 Q. You mentioned that the Lawson</p> <p>3 personnel that was on site here during the</p> <p>4 implementation phase assisted with training.</p> <p>5 Can you provide some specifics about</p> <p>6 the type of training that was offered by Lawson</p> <p>7 during that time period with respect to</p> <p>8 procurement and supply chain?</p> <p>9 A. They would hold work sessions. One,</p> <p>10 in particular, I remember, was on vendor returns.</p> <p>11 That was something that we weren't using, so they</p> <p>12 kind of did a session on how it would work, what</p> <p>13 we needed to do to make that process work.</p> <p>14 Q. Was there training provided with</p> <p>15 respect to using the search functionality within</p> <p>16 the requisition self-service?</p> <p>17 A. Requisition self-service is not live</p> <p>18 currently, so that wasn't really worked on during</p> <p>19 our initial implementation. That's a project</p> <p>20 we've picked up during '09, so we really didn't</p> <p>21 have the Lawson personnel on site at that time.</p> <p>22 Towards the end of their, I guess,</p> <p>23 contract with us for training services, Henry did</p> <p>24 provide some assistance on how that would work,</p> <p>25 but that work was primarily done on our own.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>29</p> <p>1 Q. When did South Jersey go live with 2 requisition self-service? 3 A. We have not gone live yet. 4 Q. Is there a plan in place about when 5 you expect to go live with requisition 6 self-service? 7 A. No. 8 Q. Do you know whether South Jersey 9 intends to use requisition self-service in the 10 future? 11 A. I believe, yes. And we have most of 12 the work done and ready, but then we had a 13 turn-over of staff and it just wasn't feasible to 14 really move forward with it at that time. 15 Q. Do you know whether South Jersey 16 intends to use procurement punchout in the future? 17 A. That's not something that we've ever 18 contracted with. We inquired pricing, but nothing 19 we've actually submitted for budget approval. 20 Q. Was there any training done on using 21 the search functionality within the requisitions 22 module during the implementation phase of Lawson 23 9? 24 A. To search for an item? 25 Q. Correct.</p>	<p>31</p> <p>1 that, so I'm not well-versed in that. 2 Q. Has Lawson provided you with -- has 3 Lawson provided South Jersey with training for 4 requisition self-service, even if you're not using 5 it currently? 6 A. No. 7 Q. Is there any contract with Lawson in 8 place for Lawson to provide, in the future, 9 training for requisition self-service? 10 A. No. 11 Q. Has any new data been imported into 12 the Item Master since the Lawson 9 System went 13 live in November of '08? 14 A. Imported or added? 15 Q. Added. 16 A. We've added items, yes. 17 Q. What about imported? 18 A. We have imported purchasing classes 19 against existing items, but we have not -- once 20 the initial Item Master was populated, we didn't 21 go back and reload anything during import. 22 Q. Okay. When items were added -- have 23 been added, can you explain to me what the process 24 entails of adding items to the Item Master? 25 A. Our purchasing staff actually adds</p>
<p>30</p> <p>1 A. I mean, there was training on how to 2 use search in general. The search for the Item 3 Master is no different than a search for anything 4 else. 5 Q. Are there advanced search 6 functionalities available in the requisition 7 module that South Jersey has in place from Lawson? 8 A. No, I'm not aware of any advanced 9 search functionality. 10 Q. Do you know whether there's a search 11 by catalog functionality available? 12 A. I'm not sure what you mean by search 13 by catalog. I mean, you can search by item 14 number, by description. 15 Q. Can you search by -- are you familiar 16 with the term UNSPSC? 17 A. Yes, we don't use them. 18 Q. You don't use UNSPSC? 19 A. Correct. 20 Q. Okay. 21 A. Now, in requisition self-service, 22 maybe that's where you're getting that advanced 23 search functionality. In there, you can search by 24 description, item, that sort of stuff. Again, you 25 can set up keyword searches. But we're not using</p>	<p>32</p> <p>1 the items, so I can speak in general. They have 2 to give it a Lawson number, the description, 3 whatever the required fields are, they're going to 4 kind of assign that to a vendor. They're going to 5 put stock unit of measure, purchase unit of 6 measure, transaction unit of measure. They will 7 then link that, if it's an inventory item, to what 8 inventory location they want that item to be 9 available from. 10 Q. What about if it's a nonstock item? 11 A. If it's a nonstock item, they have to 12 put some -- well, there's GL categories either 13 way, but it's a little bit different set-up 14 depending on whether it's inventory or not. If 15 it's a nonstock item, they wouldn't have to tie 16 that to an inventory location, so it would be 17 built in just strictly Item Master, not taken to 18 the next step. 19 Q. So when items are added, it's done on 20 an item-by-item basis? 21 A. Yes. 22 Q. Does Lawson currently provide any 23 training services to South Jersey? 24 A. We're not contracted with Lawson for 25 any training services.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>33</p> <p>1 Q. What kind of maintenance services</p> <p>2 does Lawson provide to South Jersey?</p> <p>3 A. Under our maintenance agreement is</p> <p>4 really just support of the applications. That</p> <p>5 gives us access to their knowledge base, the</p> <p>6 ability to enter support tickets.</p> <p>7 Q. And do you know -- I know that Lawson</p> <p>8 has different categories of maintenance service.</p> <p>9 Do you know what the classification of your</p> <p>10 maintenance package is? I think they call it,</p> <p>11 like, gold, silver or bronze.</p> <p>12 A. I believe we're at bronze.</p> <p>13 Q. Okay.</p> <p>14 A. We have the lowest level that's</p> <p>15 offered.</p> <p>16 Q. All right.</p> <p>17 A. We don't have a dedicated support</p> <p>18 rep, we don't have..</p> <p>19 Q. And do you know what type of</p> <p>20 maintenance has been performed on the customer</p> <p>21 procurement system over the past couple of years?</p> <p>22 A. Maintenance by who?</p> <p>23 Q. By Lawson.</p> <p>24 A. Lawson has provided assistance in</p> <p>25 ticket problem solving. They have not done</p>	<p>35</p> <p>1 A. Lawson provides patches that they</p> <p>2 suggest we apply to the system. I have not been</p> <p>3 forced to put something on to the system yet.</p> <p>4 Q. And when Lawson provides these</p> <p>5 patches, is it South Jersey's practice to upgrade</p> <p>6 it with the patches offered by Lawson?</p> <p>7 A. Only if we're experiencing the</p> <p>8 problem that the patch will fix, so South Jersey</p> <p>9 does not apply most of the patches that Lawson</p> <p>10 provides.</p> <p>11 Q. Are there any uses of the Lawson</p> <p>12 Software that are prohibited by Lawson?</p> <p>13 A. I would think in their contract, yes.</p> <p>14 I can't disclose a lot of stuff about it. I mean,</p> <p>15 we're licensing the software from Lawson. They</p> <p>16 own it.</p> <p>17 Q. What's the term of your license</p> <p>18 agreement with Lawson for the Procurement Suite</p> <p>19 and the Supply Chain Management Suite; is it a</p> <p>20 yearly --</p> <p>21 A. It's a yearly maintenance.</p> <p>22 Q. Okay. And are you required to renew</p> <p>23 it at the end of each year for the following year?</p> <p>24 A. We're -- yes. I mean, if we don't</p> <p>25 pay our maintenance bill, we won't have support.</p>
<p>34</p> <p>1 anything on the system for us.</p> <p>2 Q. Is that assistance provided over the</p> <p>3 phone?</p> <p>4 A. It's usually through their</p> <p>5 interactive web support. It can be provided over</p> <p>6 the phone. They have, on occasion, connected via</p> <p>7 WebEx session to actually look at the system, but</p> <p>8 that's pretty rare.</p> <p>9 Q. Has there been any maintenance</p> <p>10 performed by someone from Lawson here live at</p> <p>11 South Jersey since the Lawson 9 System went live</p> <p>12 in November of '08?</p> <p>13 A. Not since the week after Go Live.</p> <p>14 Q. Has Lawson -- does Lawson place any</p> <p>15 contractual restrictions on the ability of South</p> <p>16 Jersey to modify the software that they provided?</p> <p>17 A. We have an application called design</p> <p>18 studio which allows us to modify screens, forms,</p> <p>19 that type of thing, so in that regard, we're able</p> <p>20 to make modifications, but we can't take their</p> <p>21 code and, you know, make it our own and that sort</p> <p>22 of thing, if that is answering your question.</p> <p>23 Q. Does Lawson require South Jersey to</p> <p>24 periodically update the software in case of bug</p> <p>25 fixes or upgrades or other reasons?</p>	<p>36</p> <p>1 That's all I'm required to do, is pay my</p> <p>2 maintenance bill. There's nothing else that I</p> <p>3 need to sign or do as part of that process.</p> <p>4 (Exhibit South Jersey 4 as received</p> <p>5 and marked for identification.)</p> <p>6 Q. The court reporter has handed you</p> <p>7 what has been marked as South Jersey 4. And for</p> <p>8 the record, we have -- the document is Bates</p> <p>9 stamped SJH 2 through SJH 84. It is entitled</p> <p>10 "Lawson Professional Services, Statement of Work</p> <p>11 for South Jersey Health System, Inc."</p> <p>12 Are you familiar with this document?</p> <p>13 A. Yes.</p> <p>14 Q. And can you describe for me what it</p> <p>15 is?</p> <p>16 A. This is a summary on detail of what</p> <p>17 we contracted with Lawson for our implementation</p> <p>18 and our Go Live with the Lawson 9 upgrade.</p> <p>19 Q. And what was your role in that</p> <p>20 process?</p> <p>21 A. Picking through this to make it say</p> <p>22 what I wanted it to say. I have intimate</p> <p>23 knowledge of it.</p> <p>24 Q. Okay. So you were personally</p> <p>25 involved in negotiating this Statement of Work</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>37</p> <p>1 with Lawson?</p> <p>2 A. Yes.</p> <p>3 Q. And who was your counterpart on the</p> <p>4 Lawson side that you were dealing with with</p> <p>5 respect to this document?</p> <p>6 A. Karen and -- can I look at this?</p> <p>7 Q. Sure.</p> <p>8 A. I think her name is on here.</p> <p>9 Our account executive and Karen</p> <p>10 Bruschke is primarily who it went back and forth</p> <p>11 with.</p> <p>12 Q. And how much -- what was the time</p> <p>13 period during which you were negotiating this</p> <p>14 Statement of Work with Lawson?</p> <p>15 A. I think it went over a month's time.</p> <p>16 I don't know exactly from start to finish. There</p> <p>17 were several revisions of this Statement of Work.</p> <p>18 Q. What's the -- what's your</p> <p>19 understanding about the purpose of this Statement</p> <p>20 of Work?</p> <p>21 A. This is what contractually Lawson was</p> <p>22 obligated to do for us, what their</p> <p>23 responsibilities were, what South Jersey's</p> <p>24 responsibilities were, what work was actually</p> <p>25 going to be performed.</p>	<p>39</p> <p>1 A. Yes.</p> <p>2 Q. Do you see there there's a list of</p> <p>3 various business processes?</p> <p>4 A. Yes.</p> <p>5 Q. Is it your understanding that Lawson</p> <p>6 was to be responsible for the business processes</p> <p>7 listed here on page 7?</p> <p>8 A. Responsible in what regard?</p> <p>9 Q. Well, this is defined in the scope of</p> <p>10 the project for the new Lawson Software that was</p> <p>11 going to be installed, correct?</p> <p>12 A. The whole document, yes.</p> <p>13 Q. And what's your understanding about</p> <p>14 the specific business processes here; what's the</p> <p>15 reason they're included in this document?</p> <p>16 A. These are examples of processes that</p> <p>17 would fall under the inventory control module of</p> <p>18 Lawson.</p> <p>19 Q. Okay.</p> <p>20 A. This area doesn't dictate whose</p> <p>21 responsible for doing what regarding that business</p> <p>22 process.</p> <p>23 Q. Okay. One of the business processes</p> <p>24 listed here is "Item Master Management."</p> <p>25 Do you see that?</p>
<p>38</p> <p>1 Q. Does the Statement of Work define, as</p> <p>2 well, what type of services that Lawson would</p> <p>3 provide to South Jersey with respect to the</p> <p>4 implementation and installation of the Lawson 9</p> <p>5 Software?</p> <p>6 A. Yes.</p> <p>7 Q. Could you take a look, please, at</p> <p>8 page 6 of the document, which is Bates stamped SJH</p> <p>9 7?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Do you see here there's a Section 3.4</p> <p>12 entitled "Business Process Scope"?</p> <p>13 A. Yes.</p> <p>14 Q. And.</p> <p>15 Can you explain to me what you</p> <p>16 understand that Section 3.4 to mean?</p> <p>17 A. This is a summary of the applications</p> <p>18 that were going to be implementing, what general</p> <p>19 category it fell under, and then specific business</p> <p>20 processes that would be part of that.</p> <p>21 Q. Do you see at the top of page 7,</p> <p>22 Bates stamped SJH 8, there's a box under the</p> <p>23 heading for the column "Application Suite," it</p> <p>24 says, "Supply Chain Management," and to the right</p> <p>25 of it, it says, "Inventory Control"?</p>	<p>40</p> <p>1 A. Yes.</p> <p>2 Q. And what's your understanding of what</p> <p>3 that business process involves?</p> <p>4 A. The ability to know how to put items</p> <p>5 into the Item Master, to change information for</p> <p>6 existing items, to be able to delete an item, once</p> <p>7 it's in the Item Master, what else it might need</p> <p>8 to go from there. Like, if it's inventory, then</p> <p>9 you have to put it to an inventory location.</p> <p>10 Q. And who was responsible for the Item</p> <p>11 Master management; was it Lawson or South Jersey</p> <p>12 or was it a shared responsibility?</p> <p>13 A. I was going to say it's shared. I</p> <p>14 mean, ultimately, South Jersey was responsible for</p> <p>15 Item Master management.</p> <p>16 Q. But to the extent it was shared, what</p> <p>17 responsibilities did Lawson have?</p> <p>18 A. They provided training and assistance</p> <p>19 in how it should be set up.</p> <p>20 Q. Turning back to the page before, page</p> <p>21 6, SJH 7, do you see there's -- under the</p> <p>22 "Business Processes" list, one of the processes is</p> <p>23 "Requisition of Goods and Services"?</p> <p>24 A. Yes.</p> <p>25 Q. What's that process meant to</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>41</p> <p>1 describe?</p> <p>2 A. How requisitions get into the system</p> <p>3 to become purchase orders.</p> <p>4 Q. And whose responsibility within the</p> <p>5 Statement of Work was it to implement the</p> <p>6 requisition of goods and services?</p> <p>7 A. That's a shared responsibility,</p> <p>8 again.</p> <p>9 Q. If you take a look at page 9 of the</p> <p>10 document, SJH 10, there's a Section 3.5, "Data</p> <p>11 Migration and Conversions."</p> <p>12 Do you see that section?</p> <p>13 A. Yes.</p> <p>14 Q. What do you understand data migration</p> <p>15 and conversions to refer to?</p> <p>16 A. Getting the data out of the old</p> <p>17 system into the new.</p> <p>18 Q. And whose responsibility was it under</p> <p>19 the Statement of Work for the data migration and</p> <p>20 conversion?</p> <p>21 A. South Jersey's.</p> <p>22 Q. And was Lawson responsible for</p> <p>23 assisting South Jersey in that process?</p> <p>24 A. They were responsible, yes, to</p> <p>25 assist, but it was our responsibility to actually</p>	<p>43</p> <p>1 Q. Do you have an understanding about</p> <p>2 how the IC811 program is -- the functionality of</p> <p>3 that program?</p> <p>4 A. I can speak to general knowledge of</p> <p>5 how an import program would work, not specifically</p> <p>6 IC811.</p> <p>7 Q. Okay. And what's your general</p> <p>8 knowledge of how an import program would work?</p> <p>9 A. There's a defined file layout that</p> <p>10 you have to populate your data into that format,</p> <p>11 and if you do that correctly, when you run the</p> <p>12 program, it will then take your data and import it</p> <p>13 into the proper fields in the new database</p> <p>14 structure.</p> <p>15 Q. Do you see above this chart here, in</p> <p>16 section 3.5, there's a sentence that reads,</p> <p>17 "Lawson will assist SJHS personnel in formatting,</p> <p>18 error checking and running the API's"?</p> <p>19 A. Yes.</p> <p>20 Q. Did Lawson assist South Jersey</p> <p>21 personnel in formatting, error checking and</p> <p>22 running the API's as part of the data conversion</p> <p>23 process?</p> <p>24 A. Yes.</p> <p>25 Q. Can you describe for me what that</p>
<p>42</p> <p>1 do the conversion.</p> <p>2 Q. Do you see there's a chart at the</p> <p>3 bottom of page 9, South Jersey SJH 10, that has</p> <p>4 "Item Number CV-04"?</p> <p>5 A. Yes.</p> <p>6 Q. And the "Conversion Component" listed</p> <p>7 there is "Item Master."</p> <p>8 A. Yes.</p> <p>9 Q. Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Do you see that there's a designation</p> <p>12 here of "IC811" for the "Conversion Method"?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know what that refers to,</p> <p>15 IC811?</p> <p>16 A. IC811 would be a standard Lawson</p> <p>17 import, that if we followed their specified</p> <p>18 guidelines, we could upload the Item Master using</p> <p>19 that program.</p> <p>20 Q. And what were the specified</p> <p>21 guidelines that Lawson provided with respect to</p> <p>22 using the IC811 import program?</p> <p>23 A. I don't know. I don't believe we use</p> <p>24 IC811. I believe we used the Lawson add-ins to</p> <p>25 upload our Item Master.</p>	<p>44</p> <p>1 assistance entailed?</p> <p>2 A. Knowledge of what needed to be</p> <p>3 populated in the field, if there was an error, how</p> <p>4 to go about resolving what that error would be.</p> <p>5 Q. So Lawson provided you with that</p> <p>6 knowledge necessary for how to populate the fields</p> <p>7 and how to handle errors?</p> <p>8 A. They provided assistance where there</p> <p>9 was questions with it. I mean, a lot of it is</p> <p>10 pretty self-explanatory.</p> <p>11 Q. Okay. On the next page of the</p> <p>12 document, page 10, Bates stamped SJH 11, there's</p> <p>13 an "Activity" described in that chart on the page</p> <p>14 as "Data Migration Workshops," and it says,</p> <p>15 "Responsible, Lawson."</p> <p>16 Did Lawson provide for South Jersey</p> <p>17 data migration workshops to define the data</p> <p>18 migration process for South Jersey?</p> <p>19 A. Not as a formal class. It would just</p> <p>20 be assistance from the consultant as the tasks</p> <p>21 were being performed.</p> <p>22 Q. And do you see on the chart there's</p> <p>23 also an item listed -- an "Activity" listed,</p> <p>24 "Training in data migration tools"?</p> <p>25 A. Yes.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>45</p> <p>1 Q. Did Lawson provide training in data</p> <p>2 migration tools to South Jersey?</p> <p>3 A. Again, not in a formal class, but as</p> <p>4 part of a work session.</p> <p>5 Q. Do you see there's also an "Activity"</p> <p>6 listed, "Test load sample data"?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know what that activity refers</p> <p>9 to?</p> <p>10 A. I would believe that that was to load</p> <p>11 up a small portion of our file to make sure it was</p> <p>12 formatted properly before running it full out.</p> <p>13 Q. And did Lawson handle that for South</p> <p>14 Jersey?</p> <p>15 A. I'm going to say no. They, together</p> <p>16 with South Jersey, would go through the steps, but</p> <p>17 they didn't take anything and specifically do a</p> <p>18 conversion on their own for us.</p> <p>19 Q. On the next page, page 11, SJH 12,</p> <p>20 there's a list of six items under the heading</p> <p>21 "Data Migration and Conversion Additional</p> <p>22 Assumptions."</p> <p>23 Do you see where I'm referring to?</p> <p>24 A. Yes.</p> <p>25 Q. And do you see Item 6 says, "The data</p>	<p>47</p> <p>1 Q. And what was involved with the</p> <p>2 outbound Item Master to ORMIS Surgery System?</p> <p>3 A. We take -- not every item in our Item</p> <p>4 Master, but those that ORMIS needs, we have them</p> <p>5 flagged, and we will take an extract out of our</p> <p>6 Item Master for them to import into the ORMIS</p> <p>7 System, so that's now a daily process. ORMIS will</p> <p>8 pick up that item and charging, cost information,</p> <p>9 to use in their billing process.</p> <p>10 Q. And who performs that extraction?</p> <p>11 A. It's now an automated process.</p> <p>12 Lawson -- I guess it would be part of Lawson</p> <p>13 Professional Services. They have an offshore</p> <p>14 interface group who actually created this</p> <p>15 interface for us.</p> <p>16 Q. So Lawson created the interface</p> <p>17 between its Item Master within the Procurement</p> <p>18 Suite and the ORMIS Surgery System that now runs</p> <p>19 automatically?</p> <p>20 A. Yes. I believe Lawson had a standard</p> <p>21 job that did this that they just tweaked to meet</p> <p>22 our needs, so it's a customized interface for us</p> <p>23 built off of one of their existing programs.</p> <p>24 Q. Could you turn, please, to page 44 of</p> <p>25 the document? It's got the label on the bottom,</p>
<p>46</p> <p>1 to be converted will be verified and validated</p> <p>2 during the planning phase which will be conducted</p> <p>3 jointly by Lawson and SJH"?</p> <p>4 A. Yes.</p> <p>5 Q. Is it correct that the data</p> <p>6 conversion was conducted jointly -- excuse me,</p> <p>7 that the data conversion was verified and</p> <p>8 validated jointly by Lawson and South Jersey?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Can you turn, please, to page</p> <p>11 13, Bates label SJH 14?</p> <p>12 Do you see there's a chart under the</p> <p>13 heading "Interface Scope"?</p> <p>14 A. Yes.</p> <p>15 Q. And there's an "Interface</p> <p>16 Description" with the "Interface ID, IF-02." The</p> <p>17 description reads, "Outbound Item Master to ORMIS</p> <p>18 Surgery System."</p> <p>19 A. Yes.</p> <p>20 Q. Could you describe for me, please,</p> <p>21 what the ORMIS Surgery System is?</p> <p>22 A. I'm not intimately familiar with</p> <p>23 ORMIS, but it is the system that they use in</p> <p>24 surgery in the OR to schedule their cases and</p> <p>25 their patients.</p>	<p>48</p> <p>1 SJH 45.</p> <p>2 Do you see item 19 there entitled</p> <p>3 "Appendix E: IF-02 Item Master to ORMIS Surgery</p> <p>4 System Interface"?</p> <p>5 Is this a description of the</p> <p>6 customized interface between the Item Master and</p> <p>7 the ORMIS Surgery System that was developed by</p> <p>8 Lawson Professional Services.</p> <p>9 A. This is copies of the Lawson to ORMIS</p> <p>10 interface that was running in the Lawson 724</p> <p>11 version. I don't believe Lawson created this</p> <p>12 initial customization. You can see there's the</p> <p>13 name Frank Gonzales in here. He was kind of a</p> <p>14 third party contracted, who I believe did this</p> <p>15 program. You can see it's a copy of Lawson's</p> <p>16 standard IC527 interface that was modified and</p> <p>17 then became ZC527 for our purposes. So this was</p> <p>18 the basis of how this new interface for Lawson 9</p> <p>19 would be developed.</p> <p>20 Q. Do you recall preparing a Request for</p> <p>21 Proposal that was sent to Lawson in 2007?</p> <p>22 A. We didn't do a formal RFP, more kind</p> <p>23 of a spreadsheet, answer these questions type</p> <p>24 thing, yes.</p> <p>25 Q. And did South Jersey submit that,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>49</p> <p>1 what's characterized as an informal RFP, to any</p> <p>2 other companies besides Lawson?</p> <p>3 A. Yes.</p> <p>4 Q. What other companies did you provide</p> <p>5 this RFP to?</p> <p>6 A. To McKesson, I believe it went to</p> <p>7 PeopleSoft, and it may have gone to SAP, but I</p> <p>8 don't believe it did.</p> <p>9 Q. And were you responsible for --</p> <p>10 A. I'm sorry, it also went to Microsoft.</p> <p>11 Q. Were you the individual at South</p> <p>12 Jersey responsible for compiling that RFP?</p> <p>13 A. Each functional area put their</p> <p>14 questions together. I was responsible for</p> <p>15 gathering all of that and submitting out to the</p> <p>16 companies.</p> <p>17 Q. And how long of an evaluation period</p> <p>18 was there to evaluate the responses to RFPs that</p> <p>19 you received?</p> <p>20 A. It was a several-month process.</p> <p>21 Q. Did each of the companies that you</p> <p>22 submitted the RFP to provide you with a response?</p> <p>23 A. We got responses from Microsoft, from</p> <p>24 Lawson, from McKesson.</p> <p>25 Q. At the time that you submitted this</p>	<p>51</p> <p>1 this deposition.</p> <p>2 Q. You're answering questions I didn't</p> <p>3 even ask.</p> <p>4 A. Sorry.</p> <p>5 Q. You're reading my mind.</p> <p>6 MR. GRAHAM: Did you mean to ask</p> <p>7 whether or not South Jersey had submitted an RFP</p> <p>8 to ePlus?</p> <p>9 MS. BURKE-ANDERSON: You asked her</p> <p>10 ePlus. How could she speak to ePlus and Lawson?</p> <p>11 MR. STRAPP: Right. Let me ask a</p> <p>12 different question.</p> <p>13 MS. BURKE-ANDERSON: Okay.</p> <p>14 Q. Has South Jersey ever submitted an</p> <p>15 RFP to ePlus?</p> <p>16 A. Not to my knowledge.</p> <p>17 (Exhibit South Jersey 5 as received</p> <p>18 and marked for identification.)</p> <p>19 Q. You now have in front of you South</p> <p>20 Jersey 5. This is a cover e-mail and a series of</p> <p>21 documents.</p> <p>22 Are you familiar with this series of</p> <p>23 documents, Ms. Cimino?</p> <p>24 A. So far, yes.</p> <p>25 Yes.</p>
<p>50</p> <p>1 RFP, had you -- were you using any supply chain or</p> <p>2 procurement software besides the software that you</p> <p>3 had from Lawson?</p> <p>4 A. We use Atpar for handhelds.</p> <p>5 Q. Atpar or Aptar?</p> <p>6 A. Atpar, A-T-P-A-R. They provide</p> <p>7 handhelds that we can upload requisitions from.</p> <p>8 Q. Do you still use Atpar?</p> <p>9 A. Yes.</p> <p>10 Q. Do you use any other procurement or</p> <p>11 supply chain software besides the software from</p> <p>12 Lawson and Atpar?</p> <p>13 A. We use EDI, which goes out through</p> <p>14 GHX, so I don't know if you would consider that</p> <p>15 using their software. I mean, GHX is our vendor</p> <p>16 for all EDI transactions.</p> <p>17 Q. The EDI, though, is licensed from</p> <p>18 Lawson?</p> <p>19 A. Yes.</p> <p>20 Q. Has Lawson ever submitted an RFP to a</p> <p>21 company called ePlus?</p> <p>22 A. I have no idea.</p> <p>23 Q. Okay. Before you received this --</p> <p>24 well --</p> <p>25 A. I've never heard of ePlus prior to</p>	<p>52</p> <p>1 VIDEOGRAPHER: Going off the record</p> <p>2 at 11:02.,</p> <p>3 (Off the record.)</p> <p>4 VIDEOGRAPHER: Back on the record at</p> <p>5 11:03.,</p> <p>6 BY MR. STRAPP:</p> <p>7 Q. Can you please describe for me what</p> <p>8 the series of documents marked as South Jersey 5</p> <p>9 is?</p> <p>10 A. This is our informal RFP request and</p> <p>11 Lawson's response to that request.</p> <p>12 Q. And is it correct that you received</p> <p>13 this response from Lawson to the RFP in February</p> <p>14 of 2007?</p> <p>15 A. It was February of 2007? Okay, yes,</p> <p>16 I didn't realize it went back that far.</p> <p>17 Q. Why did you decide to choose Lawson</p> <p>18 over the other companies who you had submitted the</p> <p>19 RFP to?</p> <p>20 A. My personal opinion was, Lawson</p> <p>21 Software provided the best solution for South</p> <p>22 Jersey Healthcare. McKesson's was not fully</p> <p>23 integrated, where Lawson was. Microsoft was too</p> <p>24 new into the product mix to be willing to take a</p> <p>25 chance.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>53</p> <p>1 Q. Do you see on the cover e-mail that</p> <p>2 has the label at the bottom right, SJH 115,</p> <p>3 there's an e-mail from Brian Walker to you, dated</p> <p>4 February 23, 2007?</p> <p>5 A. Yes.</p> <p>6 Q. And do you see in that e-mail that in</p> <p>7 the second paragraph Mr. Walker writes, "The</p> <p>8 proposals for license and services are estimates</p> <p>9 based on your requirements in the RFP and</p> <p>10 conversations I have had with Materials Management</p> <p>11 around their desires to upgrade the current Lawson</p> <p>12 applications and add new functionality (such as</p> <p>13 Requisition Self Service, Lawson Business</p> <p>14 Intelligence, etc.)?"</p> <p>15 A. Yes.</p> <p>16 Q. At the time, in February of 2007, was</p> <p>17 it your understanding that South Jersey had a</p> <p>18 desire to upgrade to requisition self-service?</p> <p>19 A. I believe that was the desire of the</p> <p>20 materials management department.</p> <p>21 Q. And why did you decide at the time --</p> <p>22 or, let's say, why did you decide in 2008, during</p> <p>23 the implementation and installation phase, not to</p> <p>24 upgrade to requisition self-service?</p> <p>25 A. We didn't have the time to bring</p>	<p>55</p> <p>1 South Jersey as of February '07 for each of the</p> <p>2 various Lawson applications that are listed in the</p> <p>3 chart?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know approximately how many</p> <p>6 users are licensed to use the procurement --</p> <p>7 Lawson procurement applications today?</p> <p>8 A. I'd have to look at our contracts. I</p> <p>9 believe we increased our number of users, but I</p> <p>10 don't know what we went to.</p> <p>11 Q. Could you turn, please, to SJH 129?</p> <p>12 Do you see there's a chart --</p> <p>13 spreadsheet here entitled "South Jersey</p> <p>14 Healthcare, MATERIAL MANAGEMENT ERP SYSTEM</p> <p>15 PRIORITY LISTING"?</p> <p>16 A. Yes.</p> <p>17 Q. What's your understanding of what</p> <p>18 this spreadsheet is meant to convey or reflect?</p> <p>19 A. This was a listing of what we wanted</p> <p>20 to find in a materials management system and then</p> <p>21 Lawson's comments on how they met that need.</p> <p>22 Q. And do you recall whether you were</p> <p>23 satisfied, after reviewing Lawson's comments in</p> <p>24 this document, that they could meet all of the</p> <p>25 needs South Jersey had for a material management</p>
<p>54</p> <p>1 requisition self-service live at the time we</p> <p>2 brought the four applications live. We signed the</p> <p>3 contracts in April, went live in October. That's</p> <p>4 not a lengthy time frame.</p> <p>5 Q. Do you know approximately how much</p> <p>6 time would have been required to implement --</p> <p>7 install and implement requisition self-service?</p> <p>8 A. The fact that we've been live for</p> <p>9 over a year and still don't have it running, I'd</p> <p>10 have to really hedge a guess, but...</p> <p>11 Q. But it's your understanding that</p> <p>12 April of '08 to October of '08 was not enough</p> <p>13 time -- not sufficient time to install and</p> <p>14 implement requisition self-service?</p> <p>15 A. Not in conjunction with the other</p> <p>16 modules that we needed to have up and running.</p> <p>17 Q. Can you take a look, please, at the</p> <p>18 document with the label on the bottom right, SJH</p> <p>19 121?</p> <p>20 Do you see there's a chart that has</p> <p>21 the title "South Jersey Health System Current</p> <p>22 Lawson Applications"?</p> <p>23 A. Yes.</p> <p>24 Q. Is it your understanding that that</p> <p>25 chart accurately reflects the number of users at</p>	<p>56</p> <p>1 ERP system?</p> <p>2 A. Yes.</p> <p>3 Q. If you take a look at Item 2 in this</p> <p>4 chart, it's entitled "Inventory Control (IC)</p> <p>5 Automatic Vendor Reordering - Perpetuals."</p> <p>6 A. Yes.</p> <p>7 Q. Is it your understanding that the</p> <p>8 Lawson System has the capability of identifying</p> <p>9 when items fall below a certain volume, such that</p> <p>10 the system can be configured to automatically</p> <p>11 place and transmit purchase orders to replenish</p> <p>12 that item?</p> <p>13 A. Yes.</p> <p>14 Q. And is that true both for items that</p> <p>15 are nonstock items and items in inventory?</p> <p>16 A. No, it would be for inventory items,</p> <p>17 because if it's nonstock, we don't have a par</p> <p>18 level.</p> <p>19 Q. If you take a look at page SJH 133,</p> <p>20 Item 13, it's entitled "Web Requisitioning."</p> <p>21 A. Yes.</p> <p>22 Q. In the same chart that we're looking</p> <p>23 at.</p> <p>24 A. Uh-huh.</p> <p>25 Q. Do you see under the column "Vendor</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>57</p> <p>1 Comments," there is a statement by Lawson that</p> <p>2 says, "Once on board, users benefit from many</p> <p>3 advanced capabilities, such as the ability to</p> <p>4 automatically generate multiple purchase orders</p> <p>5 for stock, non-stock, and special-order items, as</p> <p>6 well as services, from a single requisition"?</p> <p>7 A. Yes.</p> <p>8 Q. Is it your understanding that the</p> <p>9 Lawson Software that's licensed by South Jersey</p> <p>10 has the capability of automatically generating</p> <p>11 multiple purchase orders for nonstock items from a</p> <p>12 single requisition?</p> <p>13 A. Yes.</p> <p>14 Q. If you take look at the next page at</p> <p>15 Item 14, "E-procurement - possibly punchout," is</p> <p>16 it your understanding that part of the RFP -- part</p> <p>17 of what South Jersey was considering purchasing in</p> <p>18 2007 as part of its material management ERP system</p> <p>19 was a punchout functionality within that system?</p> <p>20 A. We wanted to know if we had the</p> <p>21 ability for punchout. It was never a guarantee</p> <p>22 that we would be purchasing.</p> <p>23 Q. And what's your understanding of the</p> <p>24 reason why South Jersey decided not to purchase</p> <p>25 punchout?</p>	<p>59</p> <p>1 the Item Master to a replacement or substitution</p> <p>2 item?</p> <p>3 A. Yes.</p> <p>4 Q. And as implemented on the South</p> <p>5 Jersey System, does the Lawson Software have that</p> <p>6 capability?</p> <p>7 A. Yes, but I don't believe we're using</p> <p>8 it.</p> <p>9 Q. Okay. Do you know whether South</p> <p>10 Jersey has used that functionality at any point</p> <p>11 within the Lawson Software System?</p> <p>12 A. I'm going to say no. We don't want</p> <p>13 to have two different item numbers, and this will</p> <p>14 require two different item numbers, and that's</p> <p>15 just not a road we want to go down.</p> <p>16 Q. When you say it would require two</p> <p>17 different item numbers, can you explain that?</p> <p>18 A. You have your primary item in your</p> <p>19 Item Master and then you would have to link it to</p> <p>20 what the substitute item was by item number. We</p> <p>21 don't want to have two different item numbers, we</p> <p>22 want to use just one.</p> <p>23 Q. So it's your understanding that the</p> <p>24 Lawson Software has the capability of linking a</p> <p>25 primary item in the Item Master to a substitute or</p>
<p>58</p> <p>1 A. Cost.</p> <p>2 Q. Have you had any discussions with</p> <p>3 Lawson, since the installation and implementation</p> <p>4 of Lawson 9, about adding procurement punchout?</p> <p>5 A. I think I asked our account executive</p> <p>6 for pricing on that for our last budget year, but</p> <p>7 that was really the extent of it.</p> <p>8 Q. Okay. If you look at item 20 on page</p> <p>9 SJH 136, it's entitled "Product substitution</p> <p>10 Flexibility - Conversion Factor Issues linked to</p> <p>11 one Lawson #."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And do you see in the description, it</p> <p>15 states, from Lawson, under "Vendor Comments,"</p> <p>16 "Lawson can associate an item on the Item Master</p> <p>17 to a Replacement Item should the primary item be</p> <p>18 discontinued or backordered. Users can be alerted</p> <p>19 when a Replacement exists or the Replacement can</p> <p>20 be put into production based on a specified date"?</p> <p>21 A. Yes.</p> <p>22 Q. Is it your understanding that the</p> <p>23 software -- the procurement and supply chain</p> <p>24 software licensed by South Jersey from Lawson has</p> <p>25 the capability of associating a particular item on</p>	<p>60</p> <p>1 equivalent item, but South Jersey is not currently</p> <p>2 utilizing that capability?</p> <p>3 A. Correct.</p> <p>4 Q. Do you know whether that</p> <p>5 functionality within the Lawson Software is such</p> <p>6 that the item -- the primary item can be from one</p> <p>7 vendor and the substitute item can be from a</p> <p>8 second vendor?</p> <p>9 A. I would say yes.</p> <p>10 MR. STRAPP: We'll take a break.</p> <p>11 VIDEOGRAPHER: This marks the end of</p> <p>12 Volume I, Tape No. 1 in the deposition of Lynn</p> <p>13 Cimino. Going off the record. The time is 11:16.,</p> <p>14 (Recess.)</p> <p>15 VIDEOGRAPHER: Back on the record.</p> <p>16 Here marks the beginning of Volume I, Tape No. 2</p> <p>17 in the deposition of Lynn Cimino. The time is</p> <p>18 11:33.,</p> <p>19 BY MR. STRAPP:</p> <p>20 Q. Could you tell me whether the Item</p> <p>21 Master that South Jersey has in it's Lawson</p> <p>22 Software Suite includes a collection of items and</p> <p>23 information about those items -- a collection of</p> <p>24 items and associated information about each of</p> <p>25 those items?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>61</p> <p>1 A. Yes.</p> <p>2 Q. And does that associated information</p> <p>3 about the items include part numbers?</p> <p>4 A. The vendor part number, yes.</p> <p>5 Q. Does it include price?</p> <p>6 A. Not in the Item Master.</p> <p>7 Q. Where is the price information</p> <p>8 included?</p> <p>9 A. Well, we have most of our items on</p> <p>10 contract or quote, so pricing would come in there.</p> <p>11 Q. So the pricing data is not available</p> <p>12 when you're viewing the Item Master?</p> <p>13 A. The last price paid may be available,</p> <p>14 but we're not putting in an item and putting in a</p> <p>15 price on that item.</p> <p>16 Q. Does the information about the items</p> <p>17 in the Item Master include a catalog number?</p> <p>18 A. The vendor number?</p> <p>19 Q. Yes.</p> <p>20 A. It has vendor information, yes.</p> <p>21 Q. So it will include a vendor name?</p> <p>22 A. It can.</p> <p>23 Q. Would it include some sort of vendor</p> <p>24 identification code?</p> <p>25 A. The vendor part number or item</p>	<p>63</p> <p>1 through our handhelds, that would actually become</p> <p>2 a req in the system. So in that case, our staff</p> <p>3 goes out to a par location, say the lab, for</p> <p>4 example, they'll download the items to their</p> <p>5 handheld, they'll go through their accounts on</p> <p>6 hand, they'll upload that, the system does its</p> <p>7 math, and anything that needs to be ordered will</p> <p>8 then come through on a requisition, which the</p> <p>9 buyers would then pull that req to turn it into a</p> <p>10 PO.</p> <p>11 Q. Do the buyers ever create</p> <p>12 requisitions within the Lawson System?</p> <p>13 A. Not as a general practice.</p> <p>14 Q. Are there ever occasions where that</p> <p>15 happens?</p> <p>16 A. I'm not going to swear it never has</p> <p>17 happened, but I don't see why a buyer would create</p> <p>18 that as a requisition in the system.</p> <p>19 Q. Okay. You mentioned that users</p> <p>20 create paper requisitions.</p> <p>21 Do users ever create electronic</p> <p>22 requisitions directly on the Lawson System?</p> <p>23 A. No.</p> <p>24 Q. Are you familiar with the process of</p> <p>25 creating an electronic requisition within the</p>
<p>62</p> <p>1 number, order number.</p> <p>2 Q. Will the items include a textual</p> <p>3 description of what the item is?</p> <p>4 A. Yes.</p> <p>5 Q. Does the Item Master ever include</p> <p>6 images of the item?</p> <p>7 A. We do not have any images in the</p> <p>8 system.</p> <p>9 Q. Can you walk me, please, through the</p> <p>10 steps of creating a requisition within the Lawson</p> <p>11 Software for an item? Let's say the item is, for</p> <p>12 example, a Band-Aid.</p> <p>13 A. The process from start to finish</p> <p>14 with, like, the end location requesting it or just</p> <p>15 once it's in the system what happens to it?</p> <p>16 Q. Once it's in the system, how would a</p> <p>17 user at South Jersey create a requisition for a</p> <p>18 nonstock item, like, a Band-Aid, say, for example?</p> <p>19 A. A user would create a paper</p> <p>20 requisition, route it around, get all the</p> <p>21 approvals. It would then go to the materials</p> <p>22 department. The buyer would not actually create</p> <p>23 that as a requisition within Lawson, they would</p> <p>24 just go right to a PO.</p> <p>25 If it was an item that we used</p>	<p>64</p> <p>1 Lawson System?</p> <p>2 A. Somewhat.</p> <p>3 Q. Would you be able to demonstrate that</p> <p>4 today?</p> <p>5 A. Through requisition self-service --</p> <p>6 Q. Yes.</p> <p>7 A. -- or --</p> <p>8 Q. Well, let's start with requisition</p> <p>9 self-service.</p> <p>10 A. I could probably walk you through</p> <p>11 that, yes.</p> <p>12 Q. Okay. And what about through the</p> <p>13 requisition module?</p> <p>14 A. I could probably create a req in the</p> <p>15 requisition module. I wouldn't be able to</p> <p>16 demonstrate the upload from a handheld.</p> <p>17 Q. Is the requisition self-service</p> <p>18 demonstration that you could provide through a</p> <p>19 test version of requisition self-service?</p> <p>20 A. Yes.</p> <p>21 Q. Does that test platform or test</p> <p>22 version of requisition self-service include the</p> <p>23 same item data as the Item Master that's available</p> <p>24 on the live system?</p> <p>25 A. It will have most of the information.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>65</p> <p>1 The test system is not completely in sync with</p> <p>2 production, so anything that's been added on the</p> <p>3 production side since we've copied would not be</p> <p>4 available.</p> <p>5 Q. Do you know when that copy was made</p> <p>6 in the test system?</p> <p>7 A. Within the past two or three weeks.</p> <p>8 Q. So it will have almost everything</p> <p>9 that's on the live system?</p> <p>10 A. I don't know what's been added since</p> <p>11 it's been copied, but it should have most stuff.</p> <p>12 It's more than ten items, so it's a very good</p> <p>13 sampling of our live system.</p> <p>14 Q. Okay. Have you personally received</p> <p>15 training from Lawson Professional Services</p> <p>16 employees on how to use requisition self-service?</p> <p>17 A. No.</p> <p>18 Q. And how have you come to learn how to</p> <p>19 use the requisition self-service module?</p> <p>20 A. We had a custom work flow designed</p> <p>21 for our requisition self-service, so the</p> <p>22 consultant that we used - it was not a Lawson</p> <p>23 person - kind of walked us through, and then just,</p> <p>24 you know, overseeing the process of the</p> <p>25 implementation that our lead analyst was working</p>	<p>67</p> <p>1 the Lawson process flow software, so that way it</p> <p>2 can take our requisition and route it to the</p> <p>3 appropriate approver, so it will -- the end user</p> <p>4 puts in their electronic req, and then based on</p> <p>5 what they put in there, will route to somebody for</p> <p>6 approval, and then to the next level for approval,</p> <p>7 or wherever it needs to go, until all approvals</p> <p>8 have been met. Then it would come in kind of as a</p> <p>9 completed req ready to be imported into Lawson.</p> <p>10 Q. Is South Jersey currently licensing</p> <p>11 requisition self-service from Lawson?</p> <p>12 A. Yes.</p> <p>13 Q. So there's a license fee paid by</p> <p>14 South Jersey to Lawson for requisition</p> <p>15 self-service currently?</p> <p>16 A. Well, the software was purchased. We</p> <p>17 pay ongoing maintenance.</p> <p>18 Q. Okay. And there's a custom work flow</p> <p>19 that's already in place for requisition</p> <p>20 self-service?</p> <p>21 A. In test, yes.</p> <p>22 Q. And is there an estimated -- I might</p> <p>23 have already asked you this, but let me ask you</p> <p>24 again if I have, is there an estimated date on</p> <p>25 which requisition self-service will be available</p>
<p>66</p> <p>1 on for the implementation, so I didn't personally</p> <p>2 set up requisition self-service, but I've seen it</p> <p>3 work.</p> <p>4 Q. Who was the consultant that was used</p> <p>5 to create the custom work flow for the requisition</p> <p>6 self-service?</p> <p>7 A. I don't recall his name.</p> <p>8 Q. Do you know what company he worked</p> <p>9 for?</p> <p>10 A. ISH Consulting, I believe, but...</p> <p>11 Q. And was this individual, this</p> <p>12 consultant, a subcontractor of Lawson?</p> <p>13 A. No. South Jersey contracted directly</p> <p>14 with that company.</p> <p>15 Q. Do you recall when this custom work</p> <p>16 flow for the requisition self-service was set up?</p> <p>17 A. It was somewhere between March and,</p> <p>18 I'm going to say, August of '09.</p> <p>19 Q. Do you recall why there was a custom</p> <p>20 work flow set up for requisition self-service?</p> <p>21 A. We needed a custom work flow to match</p> <p>22 our routing and our approval process.</p> <p>23 Q. Can you explain for me what you mean</p> <p>24 when you use the term custom work flow?</p> <p>25 A. The custom work flow, it's written on</p>	<p>68</p> <p>1 to South Jersey users?</p> <p>2 A. Not at this time.</p> <p>3 Q. So is it your understanding that</p> <p>4 requisitions will be electronically created by</p> <p>5 users at South Jersey once the requisition</p> <p>6 self-service system is available?</p> <p>7 A. Yes. The intent is to do away with</p> <p>8 all paper requisitions.</p> <p>9 Q. Are you familiar with the catalog</p> <p>10 search functionality within requisition</p> <p>11 self-service?</p> <p>12 A. Somewhat.</p> <p>13 Q. Are you familiar with the</p> <p>14 functionality of searching by category within</p> <p>15 requisition self-service?</p> <p>16 A. Not specifically.</p> <p>17 Q. Is it possible to search within</p> <p>18 requisition self-service by a manufacturer name?</p> <p>19 A. Like, a Zimmer name; like, our</p> <p>20 product name?</p> <p>21 Q. No. I mean, like Owens & Minor or</p> <p>22 Cardinal, a vendor name maybe is a better way to</p> <p>23 describe it.</p> <p>24 A. You can search for vendors, but not</p> <p>25 for a specific item by vendor like that regard.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>69</p> <p>1 Q. Does Lawson intend -- sorry, does</p> <p>2 South Jersey intend to import UNSPSC codes to its</p> <p>3 requisition self-service module?</p> <p>4 A. It hasn't really been discussed.</p> <p>5 I think there's a general movement towards using</p> <p>6 UNSPSC codes, but we haven't developed any plan of</p> <p>7 action with that regard.</p> <p>8 Q. With respect to the system currently</p> <p>9 in place for requisitions and purchase orders, you</p> <p>10 mentioned that the requisitions are created on</p> <p>11 paper by users at South Jersey, correct?</p> <p>12 A. Some are. Some are done through</p> <p>13 those handhelds.</p> <p>14 Q. Handhelds.</p> <p>15 And the handheld is using the Atpar</p> <p>16 System?</p> <p>17 A. Yes.</p> <p>18 Q. When a purchase order -- when a buyer</p> <p>19 of the Materials Management Group in South Jersey</p> <p>20 receives a paper requisition, can you describe for</p> <p>21 me the steps that that buyer will take in order to</p> <p>22 enter a purchase order into the system?</p> <p>23 A. The buyer will first verify that it</p> <p>24 has the approvals that it needs. If it doesn't,</p> <p>25 it will send it back to the requesters themselves,</p>	<p>71</p> <p>1 A. Yes.</p> <p>2 Q. Are you familiar with this document?</p> <p>3 A. I'm familiar with the Inventory</p> <p>4 Control User Guide, but we're on Version 9.0, not</p> <p>5 9.0.1, so I've never looked at the 9.0.1 Inventory</p> <p>6 Control User Guide.</p> <p>7 Q. Okay. Do you know when Version 9.0</p> <p>8 of the Inventory Control User Guide was published</p> <p>9 by Lawson?</p> <p>10 A. No.</p> <p>11 Q. Do you know whether there are any</p> <p>12 differences between the User Guide Version 9.0 and</p> <p>13 the User Guide Version 9.0.1?</p> <p>14 A. I don't know for certain.</p> <p>15 Q. Can you turn to page 78 of this</p> <p>16 document, please? It's got the Bates number on</p> <p>17 the bottom right of L 32326.</p> <p>18 Do you see there is a section here</p> <p>19 entitled "Options for Setting up Item Master"?</p> <p>20 A. Yes.</p> <p>21 Q. And it states in the document, "You</p> <p>22 can create a speed entry form to customize your</p> <p>23 item setup process," and then there are steps</p> <p>24 provided for creating a speed entry form.</p> <p>25 Are you familiar with this speed</p>
<p>70</p> <p>1 or if it's a capital item, it will go to finance</p> <p>2 for coding and expenses.</p> <p>3 Once all approvals are there, they</p> <p>4 will then generate the purchase order using the</p> <p>5 Lawson application.</p> <p>6 Q. And do they receive a purchase order</p> <p>7 acknowledgment after the purchase order has been</p> <p>8 submitted to the vendor for a nonstock item?</p> <p>9 A. Yes.</p> <p>10 Q. And does the purchase order</p> <p>11 acknowledgment include information about whether</p> <p>12 the nonstock item is available in inventory from a</p> <p>13 particular vendor?</p> <p>14 A. We don't take the acknowledgments</p> <p>15 back into the system, but I would believe that</p> <p>16 what they're getting back from the vendor will</p> <p>17 indicate whether it's on backorder or not.</p> <p>18 (Exhibit South Jersey 6 was received</p> <p>19 and marked for identification.)</p> <p>20 Q. The court reporter has handed you</p> <p>21 what has been marked as South Jersey 6. It's a</p> <p>22 document entitled "Inventory Control User Guide,</p> <p>23 Version 9.0.1."</p> <p>24 Do you have that document in front of</p> <p>25 you now?</p>	<p>72</p> <p>1 entry form that's described here?</p> <p>2 A. No.</p> <p>3 Q. Could you turn back a few pages to 73</p> <p>4 at Bates number L 32321?</p> <p>5 A. Okay.</p> <p>6 Q. Do you see there's a section here</p> <p>7 entitled "Setting up the Item Master"?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know whether the steps</p> <p>10 described in this section were followed by South</p> <p>11 Jersey when it was setting up its Item Master for</p> <p>12 the version of the Lawson Software that it</p> <p>13 purchased in 2008?</p> <p>14 A. Did we follow these steps in this</p> <p>15 order or -- I mean, this information, yes, was put</p> <p>16 into the file that we used to upload into our Item</p> <p>17 Master.</p> <p>18 Q. Okay. Are the versions of the User</p> <p>19 Guide that South Jersey has all Versions 9.0?</p> <p>20 A. Yes.</p> <p>21 (Exhibit South Jersey 7 was received</p> <p>22 and marked for identification.)</p> <p>23 Q. You now have in front of you South</p> <p>24 Jersey 6, which is entitled "Purchase Order User</p> <p>25 Guide, Version 9.0.1."</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>73</p> <p>1 Are you familiar with Version 9.0</p> <p>2 Purchase Order User Guide?</p> <p>3 A. Yes.</p> <p>4 Q. And does South Jersey use the Version</p> <p>5 9.0 of the Purchase Order User Guide?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know -- I'm sorry, I'm sorry,</p> <p>8 this is Exhibit 7, not Exhibit 6.</p> <p>9 What's the purpose of this Purchase</p> <p>10 Order User Guide that South Jersey has in its</p> <p>11 possession?</p> <p>12 A. It will walk you through steps in the</p> <p>13 required set-up, and then it's just knowledge. If</p> <p>14 you're not sure of something, you can refer to it.</p> <p>15 Q. Okay. And what was the purpose of</p> <p>16 the Inventory Control User Guide that we just</p> <p>17 looked at previously?</p> <p>18 A. For set-up on the inventory control</p> <p>19 screens and functionality, and then general</p> <p>20 information about how that works.</p> <p>21 Q. Can you turn to page 43, please, of</p> <p>22 the document, Bates number L 52061?</p> <p>23 Do you see there's a section entitled</p> <p>24 "What is a Vendor Item"?</p> <p>25 A. Yes.</p>	<p>75</p> <p>1 speculation.</p> <p>2 A. I was going to say, I don't know, we</p> <p>3 don't use the substitute items.</p> <p>4 Q. Well, if you have one item number in</p> <p>5 the Item Master that's used for a particular item</p> <p>6 that could be purchased from two different</p> <p>7 vendors, how does the system know which vendor you</p> <p>8 intend to purchase it from if you put in the one</p> <p>9 item number that applies to the item from the two</p> <p>10 vendors; is there a default primary vendor?</p> <p>11 A. I don't know that you mark one of</p> <p>12 those vendors as primary over the other. I don't</p> <p>13 believe there's a field for that. But because our</p> <p>14 items are tied to contracts and we have a default</p> <p>15 pricing scheme, the item that's on contract is</p> <p>16 tied to the vendor, and that's how it would</p> <p>17 default for us.</p> <p>18 Q. If the item that was on contract was</p> <p>19 unavailable, could the user then purchase that</p> <p>20 item from the second vendor?</p> <p>21 A. The user could purchase that item</p> <p>22 from the second vendor any time they wanted to by</p> <p>23 overriding the default vendor that's populated on</p> <p>24 the PO.</p> <p>25 Q. So the two items with the same item</p>
<p>74</p> <p>1 Q. And the last sentence in that</p> <p>2 paragraph states, "You can assign multiple vendor</p> <p>3 items for the same vendor to one Lawson item."</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Do you have an understanding of what</p> <p>7 that sentence means?</p> <p>8 A. Yes.</p> <p>9 Q. Can you explain, please?</p> <p>10 A. You have one item number in your Item</p> <p>11 Master that you could purchase from two different</p> <p>12 vendors, so you can set up the purchase</p> <p>13 information for each of those vendors, what the</p> <p>14 vendor's order number or item number would be and</p> <p>15 information specific to the vendor.</p> <p>16 Q. And we were discussing earlier the</p> <p>17 ability to set up a primary item and a substitute</p> <p>18 item.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Would it be the case that you could</p> <p>21 set up the primary item, such that its purchased</p> <p>22 from one vendor, and a substitute item, such as</p> <p>23 its purchased from the second vendor, yet they</p> <p>24 both have the same item number?</p> <p>25 MR. GRAHAM: Objection; calls for</p>	<p>76</p> <p>1 number from the two different vendors would either</p> <p>2 be identical items or generally equivalent items?</p> <p>3 A. Yes.</p> <p>4 Q. Can you turn, please, to page 63. It</p> <p>5 has the Bates number L 52081. There's a section</p> <p>6 in the document entitled "Setting Up Vendor</p> <p>7 Items," and it says under this heading that the</p> <p>8 first step to set up a vendor item or to set up</p> <p>9 multiple vendor items is to access vendor items PO</p> <p>10 13.3.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Are you familiar with the PO 13.3</p> <p>14 program?</p> <p>15 A. I'm familiar with 13.1 more so,</p> <p>16 but...</p> <p>17 Q. And what is the 13.1 program used to</p> <p>18 do?</p> <p>19 A. That's where you actually assign the</p> <p>20 vendor to that item, so my Band-Aids get assigned</p> <p>21 to Owens or Medline or something like that.</p> <p>22 Q. Did Lawson run this 13.1 program or</p> <p>23 was that implemented by South Jersey?</p> <p>24 A. 13.1 is really a form, it's not</p> <p>25 actually a program, so when you say run it, I</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>77</p> <p>1 don't know what that really means.</p> <p>2 Q. Who compiles the information for the</p> <p>3 form that has that 13.1 designation?</p> <p>4 A. South Jersey.</p> <p>5 Q. And does Lawson provide training on</p> <p>6 how to complete that form?</p> <p>7 A. Yes.</p> <p>8 Q. Can the vendor identification code be</p> <p>9 used as a -- is that a searchable field within</p> <p>10 requisition self-service?</p> <p>11 A. I don't know.</p> <p>12 Q. Would you turn the page to page 64,</p> <p>13 L 52082? There's a heading here, "Setting Up a</p> <p>14 Substitute Vendor Item?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Are you familiar with the substitute</p> <p>17 vendor item set-up procedure?</p> <p>18 A. No.</p> <p>19 Q. Can you turn, please, to page 90? It</p> <p>20 has the number on the bottom, L 52108.</p> <p>21 A. Okay.</p> <p>22 Q. Do you see there's a section entitled</p> <p>23 "Interfacing Data"?</p> <p>24 A. Yes.</p> <p>25 Q. And it reads, in the paragraph</p>	<p>79</p> <p>1 our master terms and conditions agreement with</p> <p>2 Lawson when we purchased our software for the</p> <p>3 upgrade.</p> <p>4 Q. And I see that for South Jersey the</p> <p>5 name of the individual who signed this document is</p> <p>6 John DiAngelo.</p> <p>7 Is he currently the CFO of South</p> <p>8 Jersey?</p> <p>9 A. Yes.</p> <p>10 Q. And do you report to John DiAngelo?</p> <p>11 A. Indirectly.</p> <p>12 Q. Who is your direct manager?</p> <p>13 A. My direct manager is Carol Mosley.</p> <p>14 Q. What's her --</p> <p>15 A. Shall I keep going up the chain until</p> <p>16 we get to John or --</p> <p>17 Q. Sure. Well, let's start with --</p> <p>18 A. Carol?</p> <p>19 Q. Carol, yeah.</p> <p>20 A. Carol Mosley is the director of</p> <p>21 business systems. She in turn reports to Tom</p> <p>22 Pasik, who is the CIO and chief information</p> <p>23 officer, who directly reports to John DiAngelo.</p> <p>24 Q. Can you turn to Section 2.2.1 of this</p> <p>25 master terms and conditions? It's on page 3,</p>
<p>78</p> <p>1 underneath the heading, "You must prepare the</p> <p>2 non-Lawson interface files that contain the vendor</p> <p>3 items and pricing information, transfer the</p> <p>4 non-Lawson files to the server where your S3</p> <p>5 Lawson System Foundation is installed, and load</p> <p>6 each transferred file into the appropriate Lawson</p> <p>7 interface file."</p> <p>8 Do you know whether South Jersey ever</p> <p>9 loaded onto its Lawson Software, non-Lawson</p> <p>10 interface files with vendor items and pricing</p> <p>11 information?</p> <p>12 A. We have contracts that are loaded in</p> <p>13 the system, but we use the add-ins to upload our</p> <p>14 contract information.</p> <p>15 Q. You haven't used PO 536, the vendor</p> <p>16 price agreement load, to convert data?</p> <p>17 A. No.</p> <p>18 (Exhibit South Jersey 8 was received</p> <p>19 and marked for identification.)</p> <p>20 Q. You have in front of you now South</p> <p>21 Jersey 8.</p> <p>22 Do you recognize this document?</p> <p>23 A. Yes.</p> <p>24 Q. What is the document?</p> <p>25 A. This is our product order form and</p>	<p>80</p> <p>1 Bates number SJH 101.</p> <p>2 A. 2.2.1?</p> <p>3 Q. Sorry, 2.2.3.</p> <p>4 A. Okay.</p> <p>5 Q. Do you see that it states there,</p> <p>6 "Customer may copy the Lawson Documentation and</p> <p>7 Service Deliverables only for use with the</p> <p>8 applicable Software under the License"?</p> <p>9 A. Yes.</p> <p>10 Q. And do you see in Section 2.2.1, it</p> <p>11 says, "The Specified Customer identified in an</p> <p>12 Order Form may copy the Software listed in that</p> <p>13 Order Form only for backup and archival purposes"?</p> <p>14 A. Yes.</p> <p>15 Q. Is it your understanding that those</p> <p>16 are the terms and conditions that apply to South</p> <p>17 Jersey's use of the Lawson Software?</p> <p>18 A. Yes.</p> <p>19 Q. And if you take a look at Section</p> <p>20 2.4.1, it states, "Customer may modify the Lawson</p> <p>21 Products and Service Deliverables only to the</p> <p>22 extent permitted under an Order Form or described</p> <p>23 in the Documentation for those Products."</p> <p>24 Do you understand that Lawson --</p> <p>25 excuse me, that South Jersey is only permitted to</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>81</p> <p>1 modify the Lawson Software to the extent permitted</p> <p>2 under an order form or described in the</p> <p>3 documentation?</p> <p>4 A. Yes.</p> <p>5 Q. And, generally, with respect to this</p> <p>6 document, do you have an understanding that there</p> <p>7 are certain restrictions on the use and</p> <p>8 installation of the Lawson Software that South</p> <p>9 Jersey has agreed to in connection with its</p> <p>10 license of the software?</p> <p>11 A. Yes.</p> <p>12 (Exhibit South Jersey 9 was received</p> <p>13 and marked for identification.)</p> <p>14 Q. You have in front of you now what has</p> <p>15 been marked as Exhibit South Jersey 9. You'll see</p> <p>16 that this is a series of documents and that the</p> <p>17 first page of this series of documents is a cover</p> <p>18 e-mail that has your name on it.</p> <p>19 A. Yes.</p> <p>20 Q. Are you familiar with this set of</p> <p>21 documents?</p> <p>22 A. Yes.</p> <p>23 Q. Can you describe for me, please, what</p> <p>24 it is?</p> <p>25 A. This was Lawson's proposal for the</p>	<p>83</p> <p>1 Q. Let me ask that question again.</p> <p>2 A. Yeah.</p> <p>3 Q. I'm sorry.</p> <p>4 Was this proposal accepted by South</p> <p>5 Jersey in the form that it's presented here?</p> <p>6 A. I don't know without our actual</p> <p>7 contract to compare.</p> <p>8 Q. Okay. Do you know approximately what</p> <p>9 the annual license fee is that's paid by South</p> <p>10 Jersey to Lawson for the Lawson supply chain</p> <p>11 management system?</p> <p>12 A. My maintenance is bundled together,</p> <p>13 so specifically for supply chain, no.</p> <p>14 Q. What's the total fee that's paid to</p> <p>15 Lawson on an annual basis by South Jersey?</p> <p>16 A. Somewhere in the neighborhood of</p> <p>17 \$90,000.</p> <p>18 Q. Take a look, please, at SJH 150.</p> <p>19 A. Okay.</p> <p>20 Q. And do you see there's a title for</p> <p>21 this page, "OPTIONAL INTERFACE/CONVERSION</p> <p>22 PACKAGE"?</p> <p>23 A. Yes.</p> <p>24 Q. And if you take a look towards the</p> <p>25 middle of the page, there's a subheading,</p>
<p>82</p> <p>1 software modules that we were going to implement,</p> <p>2 the service that they were going to provide with</p> <p>3 the costing to back that up, as well as, like,</p> <p>4 their implementation approach.</p> <p>5 Q. Was this a follow-on proposal in</p> <p>6 response to the RFP that was sent to Lawson</p> <p>7 earlier in 2007?</p> <p>8 A. Yes.</p> <p>9 Q. If you take a look at the page with</p> <p>10 the number SJH 145.</p> <p>11 A. Okay.</p> <p>12 Q. Do you see that there is some</p> <p>13 information on software proposal details on that</p> <p>14 page?</p> <p>15 A. Yes.</p> <p>16 Q. And there's a proposal here to add a</p> <p>17 certain amount of users for modules of the supply</p> <p>18 chain management system?</p> <p>19 A. Yes.</p> <p>20 Q. Do you have an understanding of what</p> <p>21 the contract was that -- how the numbers compared</p> <p>22 in the actual contract that was signed with Lawson</p> <p>23 as compared to this proposal that was provided by</p> <p>24 Lawson in 2007?</p> <p>25 A. Excuse me?</p>	<p>84</p> <p>1 "Procurement/Supply Chain Management Suite."</p> <p>2 A. Yes.</p> <p>3 Q. Can you tell me whether -- well,</p> <p>4 underneath that there's a separate subheading that</p> <p>5 says "Conversion Package, Inventory Item Master</p> <p>6 Conversion, Vendor Master Conversion."</p> <p>7 A. Yes.</p> <p>8 Q. Do you know whether South Jersey</p> <p>9 agreed to this optional conversion package offered</p> <p>10 by Lawson?</p> <p>11 A. I don't believe we did. We did all</p> <p>12 of our conversion ourselves.</p> <p>13 Q. But did Lawson assist you in any way</p> <p>14 with respect to that conversion?</p> <p>15 A. To let us know what file layouts to</p> <p>16 use, what data would go in the appropriate fields.</p> <p>17 Q. Do you know whether South Jersey has</p> <p>18 in its possession, any Requisitions Self-Service</p> <p>19 User Guide?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And do you know what version of the</p> <p>22 Requisitions Self-Service Guide?</p> <p>23 A. Not off the top of my head.</p> <p>24 (Exhibit South Jersey 10 was received</p> <p>25 and marked for identification.)</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>85</p> <p>1 Q. You now have in front of you what has</p> <p>2 been marked as South Jersey 10. It's entitled</p> <p>3 "Lawson Requisitions Self-Service User Guide,</p> <p>4 Version 9.0.1."</p> <p>5 Are you familiar with this document?</p> <p>6 A. I have a Requisitions Self-Service</p> <p>7 User Guide. Now that I see their version number</p> <p>8 is similar to the applications, I'm going to say</p> <p>9 I'm familiar with 9.0.0, again, not 9.0.1.</p> <p>10 Q. And did you download the 9.0.0</p> <p>11 version of this User Guide from the Lawson</p> <p>12 website?</p> <p>13 A. Yes.</p> <p>14 Q. Was that from my lawson.com?</p> <p>15 A. Yes.</p> <p>16 Q. Could you turn, please, to page 26?</p> <p>17 It has the Bates number on the bottom, L 45499.</p> <p>18 Do you see there there's a "Form"</p> <p>19 described as the "Keyword Search Setup" form?</p> <p>20 A. Yes.</p> <p>21 Q. Are you familiar with that form?</p> <p>22 A. I can't picture that form in my mind,</p> <p>23 but, I mean, I know there is set-up for search</p> <p>24 functions.</p> <p>25 Q. On the test version of requisition</p>	<p>87</p> <p>1 Jersey's version of requisition self-service?</p> <p>2 A. It allowed us the ability to put a</p> <p>3 purchasing class, if you would, that we could use</p> <p>4 for routing the requisition.</p> <p>5 Q. Okay. And what do you mean by a</p> <p>6 purchasing class?</p> <p>7 A. If it's a capital item, it gets a</p> <p>8 purchasing -- probably not -- purchasing class may</p> <p>9 not be the real word to use, but if it's a capital</p> <p>10 item, it would get that code to go along the</p> <p>11 capital approval process. If it's an IT item, it</p> <p>12 would get that code so it could go along the IT</p> <p>13 approval process. If it's just a general</p> <p>14 requisition, you kind of get miscellaneous to</p> <p>15 flow-through, that approval process.</p> <p>16 Q. And did the custom work flow include</p> <p>17 any additional customization besides designing who</p> <p>18 approved certain items?</p> <p>19 A. It did provide some displays on the</p> <p>20 screen for us so we could see -- I believe one of</p> <p>21 the things was comments. If you -- on our paper</p> <p>22 racks, we have a justification section where we</p> <p>23 put comments. The comments weren't being</p> <p>24 displayed on the screen that the approver would</p> <p>25 see to know what the justification was for, so</p>
<p>86</p> <p>1 self-service that you said you might be able --</p> <p>2 you said you would be able to demonstrate, has</p> <p>3 Lawson set up for that test system, keyword</p> <p>4 searches?</p> <p>5 A. Lawson hasn't done any set up of our</p> <p>6 requisition software.</p> <p>7 Q. I'm sorry.</p> <p>8 Has South Jersey set up keyword</p> <p>9 search set-ups using the form described here?</p> <p>10 A. I'm not positive.</p> <p>11 Q. And if you take a look at the next</p> <p>12 page, page 27, Bates number L 45500, there's this</p> <p>13 heading here, "Defining Categories."</p> <p>14 A. Yes.</p> <p>15 Q. On the test system of requisition</p> <p>16 self-service that South Jersey has, has it set up</p> <p>17 any categories as described on this document?</p> <p>18 A. I don't believe so.</p> <p>19 Q. You were talking earlier about a</p> <p>20 custom work flow that was designed for requisition</p> <p>21 self-service.</p> <p>22 A. Yes.</p> <p>23 Q. Can you describe for me what that</p> <p>24 custom work flow includes, the specific</p> <p>25 customization that was made available for South</p>	<p>88</p> <p>1 that was added. I think some formatting was done</p> <p>2 along the pricing, so it would display decimals</p> <p>3 and dollars and perhaps make the fields bigger or</p> <p>4 a different color, that type of stuff.</p> <p>5 Q. Do the collection of items in the</p> <p>6 Item Master within the requisition self-service</p> <p>7 module that South Jersey is licensed include part</p> <p>8 numbers?</p> <p>9 A. Can you repeat the question?</p> <p>10 Q. Sure.</p> <p>11 The collection of items within the</p> <p>12 Item Master for requisition self-service, does</p> <p>13 that include the same information for each of</p> <p>14 those items as would be available in the older</p> <p>15 version of requisition, Item Master?</p> <p>16 A. I don't believe requisition</p> <p>17 self-service has its own Item Master, so it's</p> <p>18 referencing whatever is in the Lawson Item Master.</p> <p>19 MR. STRAPP: I think we should take a</p> <p>20 break here.</p> <p>21 VIDEOGRAPHER: Going off the record.</p> <p>22 The time is 12:18.,</p> <p>23 (Luncheon recess.)</p> <p>24 VIDEOGRAPHER: Back on the record at</p> <p>25 1:14.,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>89</p> <p>1 BY MR. STRAPP:</p> <p>2 Q. Ms. Cimino, you have in front of you</p> <p>3 a computer that is networked to the South Jersey</p> <p>4 intranet; is that correct?</p> <p>5 A. To the hospital's network.</p> <p>6 Q. To the hospital's network?</p> <p>7 A. Yes.</p> <p>8 Q. And on the hospital's network, the</p> <p>9 Lawson application -- the Lawson log-in portal is</p> <p>10 available to all users; is that correct?</p> <p>11 A. To anybody who has access to the</p> <p>12 Lawson application.</p> <p>13 Q. And you have access to the Lawson</p> <p>14 application through the particular computer that's</p> <p>15 in front of you right now?</p> <p>16 A. Yes.</p> <p>17 Q. And what is on the screen in front of</p> <p>18 you currently?</p> <p>19 A. This is the log-in screen to our test</p> <p>20 system.</p> <p>21 Q. Could you please log into the Lawson</p> <p>22 System.</p> <p>23 Could you select for me, on the left,</p> <p>24 Requisition Self-Service.</p> <p>25 MR. STRAPP: Could we go off the</p>	<p>91</p> <p>1 little checkmarks showed me if it was stock or</p> <p>2 nonstock.</p> <p>3 Q. But they're not displaying here?</p> <p>4 A. They're not displaying right now.</p> <p>5 Q. Let's try searching for another item.</p> <p>6 Let's try to find one that's</p> <p>7 nonstock.</p> <p>8 A. Now you're putting me on the spot to</p> <p>9 think of a nonstock item.</p> <p>10 Q. How about masks, would that be stock?</p> <p>11 (No results.)</p> <p>12 Q. Paper.</p> <p>13 Okay. Could you scroll down here so</p> <p>14 I can see that whole -- yes, exactly.</p> <p>15 A. Do you want me to keep going?</p> <p>16 Q. Yes, please.</p> <p>17 Where it says, Paper Copier White,</p> <p>18 there's a CA next to it.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Does the CA stand for a particular</p> <p>21 vendor?</p> <p>22 A. The CA stands for case per unit of</p> <p>23 measure.</p> <p>24 Q. Oh, okay.</p> <p>25 Could you click on that particular</p>
<p>90</p> <p>1 record for one minute, please?</p> <p>2 VIDEOGRAPHER: Going off the record</p> <p>3 at 1:16.,</p> <p>4 (Off the record.)</p> <p>5 VIDEOGRAPHER: Back on the record at</p> <p>6 1:17.,</p> <p>7 BY MR. STRAPP:</p> <p>8 Q. Could you please select Shopping</p> <p>9 under the Requisition Self-Service.</p> <p>10 A. I'm sorry, I have to log in as a</p> <p>11 different user so you can see the requisition</p> <p>12 self-service.</p> <p>13 Q. Okay. Could you click on the</p> <p>14 Find/Shop on the Menu list there and select Search</p> <p>15 Catalog.</p> <p>16 Can you search for an item that you</p> <p>17 know is going to be in inventory, where there's</p> <p>18 multiple items available for multiple vendors.</p> <p>19 A. You want me to search by description,</p> <p>20 like, toothbrush?</p> <p>21 Q. Sure.</p> <p>22 A. Okay.</p> <p>23 Q. Can you tell from this display here</p> <p>24 whether these are nonstock or stock items?</p> <p>25 A. No. I can't -- I thought that those</p>	<p>92</p> <p>1 item that you're looking at there that says, Paper</p> <p>2 Copier White.</p> <p>3 A. On the item number here, you mean?</p> <p>4 Q. Yes, Item No. 1044001.</p> <p>5 And what's the vendor name here?</p> <p>6 A. The vendor name?</p> <p>7 Q. Yes.</p> <p>8 A. Network Services/Dubin Paper.</p> <p>9 Q. Could you go back to the list of</p> <p>10 search results we just had.</p> <p>11 Scroll down again, please.</p> <p>12 Could you now click on 1044003.</p> <p>13 That's also Dubin Paper.</p> <p>14 Okay. Could you go back to the</p> <p>15 search list again, please.</p> <p>16 I'm looking to see whether there's</p> <p>17 any additional nonstock items here that are from</p> <p>18 different -- paper items that are from different</p> <p>19 manufacturers other than Dubin, so let's scroll</p> <p>20 down some more to see if we can find one.</p> <p>21 That's it then.</p> <p>22 Could you scroll back up a little,</p> <p>23 please.</p> <p>24 How about the ECG Paper 2 Fold,</p> <p>25 1021229. Do you happen to know what a Paper 2</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>93</p> <p>1 Fold is?</p> <p>2 No?</p> <p>3 A. It's ECG paper with two folds in it,</p> <p>4 is what it sounds like to me.</p> <p>5 Q. Oh, it's electrocardiogram paper?</p> <p>6 A. That would be my guess from that.</p> <p>7 Q. Okay. Could you go back to the</p> <p>8 search list one more time, please.</p> <p>9 If you click on 1013019.</p> <p>10 A. 1013019, this one?</p> <p>11 Q. Right.</p> <p>12 Paper Recorder ECG.</p> <p>13 All right. I want to search for a</p> <p>14 different item.</p> <p>15 Up in the search box, yeah, let's go</p> <p>16 back.</p> <p>17 All right. Let's try searching for</p> <p>18 gloves or glove.</p> <p>19 Okay. There's one nonstock item.</p> <p>20 Are there any others there?</p> <p>21 A. This one here.</p> <p>22 Q. That's it?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Can we check to see if one of the</p> <p>25 items that doesn't have a checkmark next to it is</p>	<p>95</p> <p>1 information.</p> <p>2 Q. Do you know what manufacturer that</p> <p>3 is, what that code refers to?</p> <p>4 A. No, I'd have to look that particular</p> <p>5 code up.</p> <p>6 Q. Okay. Let's go back.</p> <p>7 There's manufacturer codes next to</p> <p>8 each of these -- underneath each of these item</p> <p>9 numbers, correct?</p> <p>10 Do you recognize any of those</p> <p>11 manufacturer codes -- do you recognize who the</p> <p>12 manufacturers are based on any of those codes?</p> <p>13 A. The MEDL, I believe, is Medline.</p> <p>14 Q. Okay. Do you know who ANSC is?</p> <p>15 A. No.</p> <p>16 Q. Or BURL?</p> <p>17 A. No.</p> <p>18 Q. Do you know who MOLN is?</p> <p>19 A. No.</p> <p>20 Q. Let's search for lotion.</p> <p>21 Okay. Can you click on the 1030363.</p> <p>22 All right. Now, could you go back,</p> <p>23 please.</p> <p>24 Can you tell by that description of</p> <p>25 the item whether that's a stock or a nonstock, the</p>
<p>94</p> <p>1 also a nonstock item that could be ordered, like,</p> <p>2 for example, glove, exam, latex, NS, small, right</p> <p>3 there, 1014007. That doesn't have any vendor</p> <p>4 information.</p> <p>5 Do you know whether that means that</p> <p>6 that item has been discontinued or it can't be</p> <p>7 ordered?</p> <p>8 A. No, it just means that they don't</p> <p>9 have all the information set up in the Item</p> <p>10 Master.</p> <p>11 Q. Okay. And that's why there's no --</p> <p>12 that's why it doesn't display whether it's</p> <p>13 nonstock or stock, because there's not enough</p> <p>14 information there to determine whether it's stock</p> <p>15 or nonstock?</p> <p>16 A. It doesn't display the vendor</p> <p>17 information because on the IC record it probably</p> <p>18 doesn't exist. I'm not really sure why the</p> <p>19 nonstock and stock flags are not showing. The</p> <p>20 stock items at your location, she -- this user</p> <p>21 could have various locations and it doesn't know</p> <p>22 what location it's looking for yet.</p> <p>23 Q. Does the manufacturer code SEPM</p> <p>24 indicate who the manufacturer of these gloves are?</p> <p>25 A. Yes, that's the manufacturer</p>	<p>96</p> <p>1 Lotion Cleansing 4IN1 8oz. Remedy that we just</p> <p>2 looked at?</p> <p>3 A. I can't tell on description if it's</p> <p>4 stock or nonstock.</p> <p>5 Q. Okay. What about the -- can you</p> <p>6 click on the last item here on this list, Lotion</p> <p>7 Hand & Body?</p> <p>8 Okay. Let's -- all right, let's --</p> <p>9 can you go back to -- go back -- could you click</p> <p>10 on the Advanced Search tab up at the top of the</p> <p>11 screen there. Yeah, that one.</p> <p>12 All right. Now -- I'm sorry, I just</p> <p>13 want to take a look, again, at the -- can you</p> <p>14 click on the first item on the list now.</p> <p>15 Thanks.</p> <p>16 All right. Let's go back.</p> <p>17 Do you see how there's cost data</p> <p>18 available for the last two items, but not for the</p> <p>19 first two on this list?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Where does -- the cost data that's</p> <p>22 available for the items at the bottom of this</p> <p>23 list, where does that reside; is that in the Item</p> <p>24 Master?</p> <p>25 A. The cost is not in the Item Master.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>97</p> <p>1 I don't know specifically where it's pulling this</p> <p>2 cost from, if it's coming because these items are</p> <p>3 on contract or if it's defaulting in here the last</p> <p>4 PO price.</p> <p>5 Q. If an item is on contract, does that</p> <p>6 information get pulled into the Item Master?</p> <p>7 A. Not into the Item Master, but there's</p> <p>8 a contracts screen where I would see the contract</p> <p>9 information.</p> <p>10 Q. Okay. And that contract information</p> <p>11 would be viewable to someone using requisition</p> <p>12 self-service?</p> <p>13 A. No.</p> <p>14 Q. So when I do a search and I see cost</p> <p>15 data up there, is it going to be the case that</p> <p>16 that cost data comes from the previous time that</p> <p>17 this was purchased?</p> <p>18 A. I don't know.</p> <p>19 Q. Okay. Can you click on the third</p> <p>20 item here, 1030363.</p> <p>21 Okay. Now, go back, please, and</p> <p>22 click on the fourth item.</p> <p>23 Okay. Now, up in the search box</p> <p>24 there where you have Lotion, can you now go in</p> <p>25 there and search instead for Medline?</p>	<p>99</p> <p>1 the error.</p> <p>2 Q. No -- I am done, but...</p> <p>3 A. Okay.</p> <p>4 Q. Is this -- do you know what this</p> <p>5 error is here?</p> <p>6 A. It's not taking my order --</p> <p>7 Q. For that item?</p> <p>8 A. -- because this account number that</p> <p>9 this item has been set up to is nonexistent.</p> <p>10 Q. Okay. So let's delete that from the</p> <p>11 Shopping Cart.</p> <p>12 A. Okay.</p> <p>13 Q. Now, let's go back to the diaper list</p> <p>14 again.</p> <p>15 And let's scroll down here.</p> <p>16 Could you select Diaper Huggies</p> <p>17 medium.</p> <p>18 All right. Go back.</p> <p>19 Scroll down again.</p> <p>20 Could you select Diaper Goodnights</p> <p>21 65lbs and over.</p> <p>22 Okay. Let's add this one.</p> <p>23 So we have now, in the cart, two</p> <p>24 different types of diapers, two types of diapers</p> <p>25 from two different manufacturers right now.</p>
<p>98</p> <p>1 Now, can you perform -- can you go in</p> <p>2 the search and do Medline, space, lotion, and now</p> <p>3 click Search.</p> <p>4 All right. Let's go back to Lotion,</p> <p>5 so a search just for lotion.</p> <p>6 And at the bottom there, let's select</p> <p>7 1424153.</p> <p>8 Okay. Now, let's add that to the</p> <p>9 cart, the Shopping Cart.</p> <p>10 Okay. Now, let's go back to the</p> <p>11 lotion search again, and can you add 1030363.</p> <p>12 Okay. Let's delete the first item</p> <p>13 from the shopping cart.</p> <p>14 All right. Select catalog search</p> <p>15 again from Find/Shop at the top, search catalog.</p> <p>16 And let's search for diaper.</p> <p>17 Okay. Scroll down.</p> <p>18 All right. Do you see where it says,</p> <p>19 Diaper Huggies, Item 1430969?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Let's select that.</p> <p>22 And let's add that to the cart.</p> <p>23 Okay. Now, can you select Checkout</p> <p>24 at the bottom of the screen.</p> <p>25 A. I don't know if you're done reading</p>	<p>100</p> <p>1 Can you now try checking out both of</p> <p>2 these.</p> <p>3 Okay. Now, when it says that the</p> <p>4 order has been approved, what does that mean?</p> <p>5 A. It said the order was complete. It</p> <p>6 needs to be approved now.</p> <p>7 Q. Okay.</p> <p>8 A. So now, whoever is the approver for</p> <p>9 this requester will get an alert to say that</p> <p>10 there's an order pending your approval.</p> <p>11 Q. Okay. Could you go back to the</p> <p>12 Lawson portal window.</p> <p>13 Let's log in again.</p> <p>14 A. Are you going to want to see req</p> <p>15 self-service? I'm not sure which user --</p> <p>16 Q. Yeah, I want to see req self-service,</p> <p>17 I want to see the approval process for the</p> <p>18 requisition now.</p> <p>19 A. I don't know that I can walk you</p> <p>20 through the whole process, because I don't know if</p> <p>21 it's all set up in here.</p> <p>22 Q. Okay. So let's select -- is there an</p> <p>23 in basket here?</p> <p>24 Let's go to approvals under</p> <p>25 requisition self-service.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>101</p> <p>1 Do you see that down at the bottom?</p> <p>2 Should that -- all right, so you're</p> <p>3 going to log in here.</p> <p>4 It's not listing any requisitions</p> <p>5 needing approval.</p> <p>6 A. Well, that's requisitions that she</p> <p>7 would need to approve. She doesn't have any.</p> <p>8 Q. I see.</p> <p>9 So someone else would be approving</p> <p>10 these requisitions?</p> <p>11 A. For her, yes.</p> <p>12 Q. Do you know who the right log-on</p> <p>13 would be for that?</p> <p>14 A. No.</p> <p>15 Q. Okay. Let's go back to the search</p> <p>16 screen that we were in before the shopping tab</p> <p>17 under requisition self-service.</p> <p>18 Could we search Huggies there.</p> <p>19 And let's select on Diaper Huggies</p> <p>20 again. It's the second on the list.</p> <p>21 All right. It says here that the</p> <p>22 source vendor is School Health Corporation.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And the manufacturer of this product</p>	<p>103</p> <p>1 All right. So this source vendor</p> <p>2 here is Owens & Minor.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And does the manufacturer code P&G</p> <p>6 suggest that it's Procter & Gamble that is the</p> <p>7 manufacturer here?</p> <p>8 A. Yes.</p> <p>9 Q. And the manufacturer for -- you think</p> <p>10 the manufacturer for Huggies would be Kimberly</p> <p>11 Clark?</p> <p>12 A. I don't know, but Huggies is not a</p> <p>13 manufacturer.</p> <p>14 Q. Right, okay.</p> <p>15 Now, let's first -- let's add this to</p> <p>16 the Shopping Cart.</p> <p>17 And let's delete the first item,</p> <p>18 let's delete the Diaper Huggies from the Shopping</p> <p>19 Cart.</p> <p>20 And let's go back to Catalog Search</p> <p>21 again on Find/Shop.</p> <p>22 Yeah, search catalog there.</p> <p>23 Let's search for gown.</p> <p>24 All right. Let's select 10001047,</p> <p>25 Gown Magna 10X.</p>
<p>102</p> <p>1 presumably is Huggies, right?</p> <p>2 A. There's no manufacturer information</p> <p>3 listed for this item.</p> <p>4 Q. Okay. But based on the description,</p> <p>5 Diaper Huggies, would you assume that Huggies is</p> <p>6 the manufacturer here?</p> <p>7 A. Actually, to me, Huggies is a brand</p> <p>8 name and, like, Kimberly Clark would be the</p> <p>9 manufacturer, or something like that.</p> <p>10 Q. Okay. Let's go back to the search</p> <p>11 box up there.</p> <p>12 A. Okay.</p> <p>13 Q. Can you search for two words, like,</p> <p>14 with a bullion search capability here; do you</p> <p>15 know? You can probably put a space -- Huggies,</p> <p>16 space, diapers. It should work. Let's try it.</p> <p>17 Or Huggies Diaper, let's do it that way.</p> <p>18 Okay, so that came up.</p> <p>19 Now, let's add Diaper Huggies to the</p> <p>20 Shopping Cart.</p> <p>21 Okay. Now, let's search again for</p> <p>22 diaper without Huggies in the box.</p> <p>23 And let's scroll down.</p> <p>24 All right. Let's select Diapers baby</p> <p>25 SZ 6. It's 1439010.</p>	<p>104</p> <p>1 Let's go back.</p> <p>2 Let's search for Gown Patient with</p> <p>3 telepocket there.</p> <p>4 A. Do you want me to search or do you</p> <p>5 want me to click --</p> <p>6 Q. Oh, no, no, sorry, click on that item</p> <p>7 there.</p> <p>8 Okay. So the source vendor here is</p> <p>9 Harbor Linen.</p> <p>10 Do you know what the manufacturer</p> <p>11 code HH stands for?</p> <p>12 A. No.</p> <p>13 Q. Okay. Let's --</p> <p>14 A. It may be Harbor Healthcare.</p> <p>15 Q. Okay. So that's a different vendor</p> <p>16 than the vendor we had for the diaper, baby size</p> <p>17 35 pounds and over in the cart?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Let's add this item to the</p> <p>20 shopping cart.</p> <p>21 And let's select Checkout.</p> <p>22 A. I have a bad account number again.</p> <p>23 Q. All right. Well, let's delete that.</p> <p>24 Let's go back to the search results</p> <p>25 we had for gown.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>105</p> <p>1 Scroll down, please.</p> <p>2 Let's click gown, surgical, with</p> <p>3 towel, small.</p> <p>4 Okay. So the vendor name here is</p> <p>5 Owens & Minor and the manufacturer, it looks like</p> <p>6 the code stands for Kimberley Clark.</p> <p>7 Do you see that?</p> <p>8 A. I guess that's it.</p> <p>9 Q. Let's add that to the cart.</p> <p>10 And let's check out here.</p> <p>11 Okay. So the order has been</p> <p>12 successfully submitted, Status: Needs Approval.</p> <p>13 Now, is there a way for you to log</p> <p>14 into the system -- or, you know, without logging</p> <p>15 in, as you already are logged in, to approve the</p> <p>16 requisition that was just entered?</p> <p>17 A. I can't approve this requisition as</p> <p>18 logged in.</p> <p>19 Q. You can or can't?</p> <p>20 A. I cannot. This user cannot approve</p> <p>21 their own requisition.</p> <p>22 Q. Okay. And do you know which user of</p> <p>23 the system could approve that requisition?</p> <p>24 A. If it was set up normally, according</p> <p>25 to our true hierarchy, I would think it would be</p>	<p>107</p> <p>1 and --</p> <p>2 A. The approval process is all built in</p> <p>3 process flow, and until it's approved, it doesn't</p> <p>4 actually appear. I don't know, I could try and</p> <p>5 see if this number is there.</p> <p>6 Q. Let's try and see.</p> <p>7 So when you enter RQ10, that's</p> <p>8 opening up requisitions?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Can you describe for me what</p> <p>11 you're doing now?</p> <p>12 A. Well, I wrote down the requisition</p> <p>13 number and then I tried to bring it up with that</p> <p>14 requester, but this number is not tied to that</p> <p>15 requester, so the number I wrote down for the</p> <p>16 requisition that was approved in req self-service</p> <p>17 is not in Lawson with that same number.</p> <p>18 Q. Could we try to electronically enter</p> <p>19 a requisition within this requisition module?</p> <p>20 A. Sure.</p> <p>21 I was going to just look and see by</p> <p>22 the requester if I could find that requisition.</p> <p>23 Q. Sure. Let's do that first.</p> <p>24 A. I think this is the one we did,</p> <p>25 43299, so when I typed the number in, I probably</p>
<p>106</p> <p>1 her director, but I don't see where he's set up as</p> <p>2 a user. This is our test system. We don't have</p> <p>3 everything built in there. I thought when I</p> <p>4 originally logged in as a Lawson user that they</p> <p>5 would have control over everything, so I can try</p> <p>6 that.</p> <p>7 Q. Do you want to try that?</p> <p>8 A. I can try that for you.</p> <p>9 Q. Okay.</p> <p>10 A. It tells me the Lawson requester</p> <p>11 itself does not exist.</p> <p>12 Q. Okay.</p> <p>13 A. So I don't really know who I need to</p> <p>14 log in as to be able to approve this request.</p> <p>15 I can peek through my notes, if you</p> <p>16 don't mind.</p> <p>17 Q. Now, can you approve the requisition</p> <p>18 that's been entered into the system through the</p> <p>19 requisition module instead of the requisition</p> <p>20 self-service module?</p> <p>21 A. I don't think the approvals exist in</p> <p>22 the requisition -- within the Lawson requisition</p> <p>23 model itself.</p> <p>24 Q. You have to go in and enter the</p> <p>25 requisitions first in the requisition module</p>	<p>108</p> <p>1 just typed it wrong.</p> <p>2 Q. Okay.</p> <p>3 A. Okay. So this should be the</p> <p>4 requisition that we generated in the requisition</p> <p>5 self-service that needs approval.</p> <p>6 Q. Okay. Now, could we review that</p> <p>7 requisition here and approve it?</p> <p>8 Like, how do we see what that</p> <p>9 requisition is through this screen?</p> <p>10 A. I would have to release it.</p> <p>11 Q. Okay.</p> <p>12 A. It says it's already been released.</p> <p>13 If I remember correctly, there is a</p> <p>14 way that you can force these through, but it's a</p> <p>15 different screen, it's not on the actual</p> <p>16 requisition screen. The whole intent of the req</p> <p>17 self-service is to make it go through the</p> <p>18 approvals and not release from here until</p> <p>19 everything is there.</p> <p>20 Q. Right.</p> <p>21 A. There should be a way to force it to</p> <p>22 release. I don't know what that is offhand.</p> <p>23 Q. We're almost out of tape here, so</p> <p>24 let's take a break, please.</p> <p>25 VIDEOGRAPHER: This marks the end of</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>109</p> <p>1 Volume 1, Tape No. 2 in the deposition of Lynn</p> <p>2 Cimino. The time is 1:51.,</p> <p>3 (Recess.)</p> <p>4 VIDEOGRAPHER: Back on the record.</p> <p>5 Here marks the beginning of Volume 1, Tape No. 3</p> <p>6 in the deposition of Lynn Cimino. The time is</p> <p>7 1:56.,</p> <p>8 BY MR. STRAPP:</p> <p>9 Q. Okay. Ms. Cimino, could you please</p> <p>10 demonstrate for me, as best as you can, how, using</p> <p>11 the Lawson System, the current live system</p> <p>12 available at South Jersey, one would search for an</p> <p>13 item, electronically request the item through a</p> <p>14 requisition -- or let's say create the</p> <p>15 requisition, approve the requisition and then</p> <p>16 create a purchase order and view the purchase</p> <p>17 order acknowledgment.</p> <p>18 A. Not in the live system.</p> <p>19 Q. Okay.</p> <p>20 A. In the test system, I can create a</p> <p>21 requisition and turn it into a PO. There is no</p> <p>22 acknowledgment to see. We don't take those back</p> <p>23 into the system.</p> <p>24 Q. Okay. Could you show us then --</p> <p>25 demonstrate for us how you would request a</p>	<p>111</p> <p>1 Can you create it in the live version</p> <p>2 of requisition?</p> <p>3 A. I don't want to.</p> <p>4 Q. Because you don't want to have an</p> <p>5 actual requisition go out and someone is going to</p> <p>6 go purchase whatever you --</p> <p>7 A. Correct, especially if you're going</p> <p>8 to mess with inventory items.</p> <p>9 Q. Okay. One more request, can you make</p> <p>10 this requisition of a nonstock item, not an</p> <p>11 inventory item?</p> <p>12 A. I can.</p> <p>13 Q. Okay.</p> <p>14 A. I mean, I would be willing to show</p> <p>15 you a requisition in the live system and then try</p> <p>16 and find the subsequent PO from there and show you</p> <p>17 all of that in the live system, but I don't want</p> <p>18 to add it in there.</p> <p>19 Q. Okay. Why don't we first do it in</p> <p>20 the test system.</p> <p>21 A. Okay.</p> <p>22 Q. And let's make it of an item that's a</p> <p>23 nonstock item.</p> <p>24 A. Okay.</p> <p>25 Q. And, preferably, if you can do it, an</p>
<p>110</p> <p>1 requisition and turn it into a purchase order?</p> <p>2 A. Okay. Normally, we wouldn't create</p> <p>3 the requisition in the system like this. If I</p> <p>4 wanted to just -- I would have my paper req, which</p> <p>5 get turned directly into a PO. If you want me to</p> <p>6 try and walk through just creating a requisition,</p> <p>7 releasing it and making a PO from that, --</p> <p>8 Q. Correct.</p> <p>9 A. -- I'll try for you.</p> <p>10 Q. Okay. And you mentioned this is a</p> <p>11 test system?</p> <p>12 A. Yes.</p> <p>13 Q. Is there any reason that you're using</p> <p>14 the test system instead of the live system?</p> <p>15 A. Requisition self-service is not</p> <p>16 installed in the live system.</p> <p>17 Q. Okay. When you're going to create</p> <p>18 the requisition here, are you going to be creating</p> <p>19 it in requisition self-service or in --</p> <p>20 A. No.</p> <p>21 Q. You're going to create it in</p> <p>22 requisition?</p> <p>23 A. I was going to create it -- I thought</p> <p>24 that's what you wanted me to do.</p> <p>25 Q. Yeah.</p>	<p>112</p> <p>1 item that is available from more than one</p> <p>2 manufacturer, more than one vendor, like a diaper,</p> <p>3 for example.</p> <p>4 A. Okay. So if I'm understanding you</p> <p>5 correctly, you want me to create a requisition for</p> <p>6 a diaper, but you also wanted a nonstock?</p> <p>7 Q. Correct.</p> <p>8 A. And diapers, for the most part, I</p> <p>9 think are stock. Okay, well, we'll see what</p> <p>10 happens.</p> <p>11 Q. Okay. And as you walk through it,</p> <p>12 describe for the record, please, each step of the</p> <p>13 way.</p> <p>14 A. Okay. So I'm logged into RQ10, which</p> <p>15 is the base requisition form within Lawson.</p> <p>16 I'm going to just choose a requester</p> <p>17 that is already set up in here.</p> <p>18 I was trying to find one that I</p> <p>19 thought it would just approve on.</p> <p>20 I have to indicate which requesting</p> <p>21 location this is coming to so then I can get the</p> <p>22 other defaults that come in, like, our purchase</p> <p>23 from location and company.</p> <p>24 And here is where I'm actually going</p> <p>25 to go ahead and pick the items that I want.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>113</p> <p>1 Q. Okay.</p> <p>2 A. So these are all my active items in</p> <p>3 here.</p> <p>4 Q. These are nonstock or both stock and</p> <p>5 nonstock?</p> <p>6 A. These are mixed stock and nonstock at</p> <p>7 this point. I'm not sure why, when I drop down,</p> <p>8 it isn't working here. I think that's just a</p> <p>9 problem on the computer.</p> <p>10 I was hoping to be able to search for</p> <p>11 an item by description.</p> <p>12 I'm searching for a description, like</p> <p>13 a diaper, and that's not really recovering good</p> <p>14 results for me.</p> <p>15 Q. Now, that search that you did was a</p> <p>16 search was a search -- based on description, you</p> <p>17 wanted to see where the description equaled -- had</p> <p>18 the word diaper in it?</p> <p>19 A. Yes.</p> <p>20 Q. And it pulled up a certain amount of</p> <p>21 items that have that description?</p> <p>22 A. Yes.</p> <p>23 Q. And now you're going to do a</p> <p>24 requisition for one of those items?</p> <p>25 A. Yes.</p>	<p>115</p> <p>1 I'm sorry, you're asking me to walk</p> <p>2 through a process that we don't normally do, so</p> <p>3 I'm a little bit -- I don't want to say I'm</p> <p>4 struggling, but I'm struggling with trying to give</p> <p>5 you what you want here.</p> <p>6 Q. Okay.</p> <p>7 A. What I'm trying to do now is just</p> <p>8 find a valid account number that I can assign to</p> <p>9 this so maybe it will approve, at least take the</p> <p>10 requisition.</p> <p>11 So it's telling me the requisition</p> <p>12 number will be assigned. I'm trying to release</p> <p>13 the requisition. And then it tells me it doesn't</p> <p>14 like my code down here.</p> <p>15 Okay. So now I was able to add a</p> <p>16 requisition. I put in bogus GL account</p> <p>17 information, but that's why we're in test.</p> <p>18 Now it says that it's an unreleased</p> <p>19 requisition.</p> <p>20 So then I would have to release this</p> <p>21 requisition.</p> <p>22 Now it says that it's released, so</p> <p>23 it's been processed.</p> <p>24 Now it should be available to become</p> <p>25 a PO.</p>
<p>114</p> <p>1 I selected one.</p> <p>2 Q. And this is nonstock; how can you</p> <p>3 tell that it's nonstock?</p> <p>4 A. I can't tell that it's nonstock at</p> <p>5 this point.</p> <p>6 Q. But as you go through this process,</p> <p>7 you'll be able to figure out whether it's nonstock</p> <p>8 or inventory?</p> <p>9 A. When it goes into the PO, I'll be</p> <p>10 able to tell if it's nonstock or inventory.</p> <p>11 Q. Okay.</p> <p>12 A. This was a bad item number, because</p> <p>13 this is one that didn't have our account number</p> <p>14 defined.</p> <p>15 Q. So do you want to go back and find</p> <p>16 something else?</p> <p>17 A. I'll go back and search for the</p> <p>18 description equals the diaper again and try and</p> <p>19 pick a better one.</p> <p>20 So it looks like it took this one.</p> <p>21 Q. That means the requisition has been</p> <p>22 built now, it's been created?</p> <p>23 A. It hasn't actually said it's been</p> <p>24 created yet.</p> <p>25 No, it's a bad account number again.</p>	<p>116</p> <p>1 So they do have a PO job that will</p> <p>2 run and find the released requisitions to turn</p> <p>3 them into the purchase orders.</p> <p>4 Q. Is that through PO20, you mentioned?</p> <p>5 A. Well, PO20 would allow me to just</p> <p>6 create this PO from the start. PO100 should</p> <p>7 process any of the unreleased requisitions. I'm</p> <p>8 going to try PO100 and see if I can get your</p> <p>9 requisition in there.</p> <p>10 PO100 doesn't seem to be giving me an</p> <p>11 option that I can pull it based on a specific</p> <p>12 requisition.</p> <p>13 I'm just creating my job to be able</p> <p>14 to run this.</p> <p>15 Q. Okay. Do you have to enter the</p> <p>16 requisition number?</p> <p>17 A. I don't see a spot to enter a</p> <p>18 specific requisition number.</p> <p>19 Q. And the requisition number -- is</p> <p>20 there a requisition number field?</p> <p>21 A. That's what I'm not seeing.</p> <p>22 Normally, when you're creating</p> <p>23 purchase orders, you're running it for everything</p> <p>24 that's there, not for one specific thing, so we're</p> <p>25 structured that, based on the requisitions -- the</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>117</p> <p>1 items that are being requested, they're tied to</p> <p>2 purchasing agents, companies and they're running</p> <p>3 this job based on their buyer profile, so whatever</p> <p>4 is out there for them will get pulled in, so</p> <p>5 you're asking me to do something that's not really</p> <p>6 part of our process.</p> <p>7 Q. Can I see how, on your system, a</p> <p>8 buyer would submit purchase orders to a vendor for</p> <p>9 nonstock items?</p> <p>10 A. I can't exactly show you that. I can</p> <p>11 tell you how they would create a purchase order,</p> <p>12 but then based on the transmission, they may fax</p> <p>13 it to the vendor, it may go through EDI or they</p> <p>14 may send a paper copy, so I can't actually show</p> <p>15 you that.</p> <p>16 Q. Can we see a demonstration of how a</p> <p>17 buyer would submit a purchase order using EDI?</p> <p>18 A. EDI is not working in the test</p> <p>19 system.</p> <p>20 Q. Can we go into the live system and</p> <p>21 see it?</p> <p>22 A. I can show you a PO and walk you</p> <p>23 through that process, but I will not add one.</p> <p>24 Q. How about if we do it for something</p> <p>25 that's, like, a cheap \$5 item and I'll spot the</p>	<p>119</p> <p>1 here? I mean, can you click on shopping so I can</p> <p>2 see -- nothing -- it's not available, or it is</p> <p>3 available?</p> <p>4 A. No, we don't have all the requesters</p> <p>5 set up in the live location.</p> <p>6 Q. Okay. Are any requesters set up yet</p> <p>7 in the live location for requisition self-service?</p> <p>8 A. There's requesters that are set up in</p> <p>9 the system, but they're not tied to the</p> <p>10 requisition self-service yet, where it would</p> <p>11 actively work.</p> <p>12 Q. I see.</p> <p>13 Okay. So we can't create a</p> <p>14 requisition on the live system using requisition</p> <p>15 self-service?</p> <p>16 A. Correct.</p> <p>17 Q. So can you create a requisition on</p> <p>18 the live system for me or is that something that</p> <p>19 you're unwilling to do or unable to do?</p> <p>20 A. That's something I'm unable to do.</p> <p>21 Q. Unable to do, okay.</p> <p>22 A. I can show you a requisition that's</p> <p>23 on the system, if you'd like to see one?</p> <p>24 Q. Yeah, let's see that.</p> <p>25 A. Okay. So I'm going back to RQ10 and</p>
<p>118</p> <p>1 cash and we can just -- we can have an extra</p> <p>2 diaper on site or something like that?</p> <p>3 A. No, N-O.</p> <p>4 Q. You can't do that?</p> <p>5 Well, can we go all the way up to the</p> <p>6 point where it would actually -- can you show me</p> <p>7 how it would work then, at least on the live</p> <p>8 system, without actually doing it?</p> <p>9 A. Just inquiring and showing you a PO</p> <p>10 and then the steps that it would go through?</p> <p>11 Q. Yes, how you would go about</p> <p>12 purchasing -- submitting a purchase order using</p> <p>13 EDI on the live system. Show me the steps that</p> <p>14 you would go through to do that on the live</p> <p>15 system.</p> <p>16 A. Okay. So I'm going to log out of</p> <p>17 test and I'm going to log into live.</p> <p>18 Q. So before we go into this, it looks</p> <p>19 like you have the requisition self-service tab</p> <p>20 available on the live system?</p> <p>21 A. The tab is here, but not everything</p> <p>22 has been built and our custom work flow is not</p> <p>23 here.</p> <p>24 Q. Okay. If someone using the live</p> <p>25 system clicked on shopping, would anything show up</p>	<p>120</p> <p>1 I'm just picking a requester and bringing up a</p> <p>2 requisition.</p> <p>3 Q. When it says handheld, does that mean</p> <p>4 that the requisition was entered through the</p> <p>5 handheld?</p> <p>6 A. Yes, which our requisitions right</p> <p>7 now -- any requisition that's generated should be</p> <p>8 coming from the handheld. Once the requisition</p> <p>9 self-service module is on, they will also be</p> <p>10 feeding into requisition self-service.</p> <p>11 Q. Aren't some of the requisitions</p> <p>12 generated by paper?</p> <p>13 A. Yes, and you shouldn't see them in</p> <p>14 here. It would be just in POs.</p> <p>15 Q. I see, okay.</p> <p>16 A. That's why I picked a handheld user,</p> <p>17 because I knew there would be requisitions there.</p> <p>18 Q. Okay.</p> <p>19 A. So I don't know if you want -- what</p> <p>20 you would like to see on this --</p> <p>21 Q. Let's just see one of the</p> <p>22 requisitions that is in the system from this</p> <p>23 particular user?</p> <p>24 A. Okay. Well, here is the main -- the</p> <p>25 header information for that requisition.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>121</p> <p>1 Q. Okay.</p> <p>2 A. The miscellaneous tab is showing the</p> <p>3 account unit that it's being expensed to.</p> <p>4 Then these are all the lines that are</p> <p>5 on this particular req, the different items that</p> <p>6 they're trying to order.</p> <p>7 Now, here you can see for this</p> <p>8 particular item there's an item type down here of</p> <p>9 I, and that's showing me that this is an inventory</p> <p>10 item.</p> <p>11 Q. Okay. Now, is the manager,</p> <p>12 Mr. DiAngelo, the one who would approve this</p> <p>13 particular requisition?</p> <p>14 A. Requisitions that are coming through</p> <p>15 handhelds right now don't require approvals.</p> <p>16 Q. So he could, himself, approve this</p> <p>17 requisition? I mean, if it doesn't require an</p> <p>18 approval, why is it still pending in the system</p> <p>19 and not --</p> <p>20 A. Well, this one's not. This one is</p> <p>21 actually a closed and processed requisition.</p> <p>22 Q. And when it's closed and processed,</p> <p>23 does that mean the purchase order has already been</p> <p>24 generated?</p> <p>25 A. Yes.</p>	<p>123</p> <p>1 and unreleased, when PO100 would run, it would</p> <p>2 pick up the unreleased requisitions to do whatever</p> <p>3 it needs to do.</p> <p>4 So I can show you -- PO20 is where</p> <p>5 you would create a purchase order.</p> <p>6 I'm going to just pick a number to</p> <p>7 show you that this is what a PO would look like.</p> <p>8 Depending on the defaults that are set up for the</p> <p>9 vendor, it would dictate the transmission method,</p> <p>10 whether it goes out EDI or paper or fax. I know</p> <p>11 the Owens & Minor vendor is set up for EDI.</p> <p>12 Q. Okay. Now, if it's set up for EDI</p> <p>13 and you wanted to submit a purchase order to Owens</p> <p>14 & Minor, what steps would you take to do that?</p> <p>15 A. Once the PO is sitting here, there is</p> <p>16 a PO120 job that runs. That's a mass issue of PO.</p> <p>17 I would run that job putting in my purchase order</p> <p>18 number and then it would take that and it would</p> <p>19 send it out to our carrier, GHX.</p> <p>20 Q. So would you receive a purchase order</p> <p>21 acknowledgment back from Owens & Minor after using</p> <p>22 that PO120 program?</p> <p>23 A. The purchase order acknowledgment</p> <p>24 would go back to GHX and I could view it there.</p> <p>25 We don't take that from GHX back into Lawson.</p>
<p>122</p> <p>1 So do you want to see an unreleased</p> <p>2 one or one that's pending?</p> <p>3 These requisitions should be, for the</p> <p>4 most part, all inventory items.</p> <p>5 Q. Okay. Can you create an</p> <p>6 unreleased -- can you create, but not release, a</p> <p>7 requisition for a nonstock item on the live</p> <p>8 system?</p> <p>9 A. No.</p> <p>10 Q. And why not?</p> <p>11 A. Because I don't want to put bad data</p> <p>12 into my production system, no matter how many</p> <p>13 times you ask me.</p> <p>14 Q. I'm sorry, I'm not trying to badger</p> <p>15 you, I'm just trying to understand what we're</p> <p>16 dealing with here.</p> <p>17 So, originally, you had mentioned</p> <p>18 that you would be able to show me on the test</p> <p>19 system how a purchase order is submitted -- or you</p> <p>20 mentioned here you were going to walk me through</p> <p>21 what it would look like to submit a purchase order</p> <p>22 using EDI in the live system, even if you're not</p> <p>23 going to actually do that, so could you show us</p> <p>24 how that would be done?</p> <p>25 A. Okay. So then once the req was here</p>	<p>124</p> <p>1 Q. Could you create, on the system,</p> <p>2 multiple purchase orders from a single</p> <p>3 requisition?</p> <p>4 A. Yes, because the requisition has the</p> <p>5 various items. Depending on who the manufacturer</p> <p>6 or who the vendor for the order is, it gets split</p> <p>7 up on that PO.</p> <p>8 Q. So for example, if, in a requisition,</p> <p>9 you had ordered two items from different vendors,</p> <p>10 two purchase orders would be created, one to each</p> <p>11 vendor?</p> <p>12 A. Yes.</p> <p>13 Q. And you mentioned that the PO</p> <p>14 acknowledgment would go back to GHX.</p> <p>15 GHX, is that the shipping carrier?</p> <p>16 A. GHX is our EDI administrator, our</p> <p>17 intermediary.</p> <p>18 Q. Okay. So EDI is a software program</p> <p>19 that you're licensing from Lawson, but the company</p> <p>20 that's managing it is GHX?</p> <p>21 A. Yeah, we transmit everything through</p> <p>22 GHX.</p> <p>23 Q. I see.</p> <p>24 Is there a way to view purchase</p> <p>25 orders that have been submitted in the system</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>125</p> <p>1 here?</p> <p>2 A. Yes.</p> <p>3 Q. Could we see that?</p> <p>4 A. Here is a purchase order that was</p> <p>5 submitted.</p> <p>6 Q. Okay. And is there a way to</p> <p>7 determine whether the item that you are attempting</p> <p>8 to purchase is available in the inventory of the</p> <p>9 vendor?</p> <p>10 A. I cannot see that here in the system.</p> <p>11 Q. Okay. Earlier, when we went into</p> <p>12 this requisition system, you did a search where</p> <p>13 you did description equals diaper.</p> <p>14 A. Yes.</p> <p>15 Q. What other fields are capable of --</p> <p>16 can you search in, besides the description field,</p> <p>17 within the RQ10 requisition program?</p> <p>18 A. Let me go back to RQ10.</p> <p>19 I think it's going to just make me</p> <p>20 put in some header information.</p> <p>21 Q. Just hold on for one second there.</p> <p>22 On active items, when you click that</p> <p>23 drop-down screen there, --</p> <p>24 A. Yes.</p> <p>25 Q. -- do you see it says, items by</p>	<p>127</p> <p>1 What else can you search by?</p> <p>2 A. Well, here, because I don't have</p> <p>3 everything up, I'm going to have to bring up a</p> <p>4 requisition that's already here.</p> <p>5 Q. Okay.</p> <p>6 A. I don't know if my computer is just</p> <p>7 really slow, but it doesn't seem like the</p> <p>8 drop-downs are working for me.</p> <p>9 So I'm searching -- you can search by</p> <p>10 item number.</p> <p>11 Q. Okay.</p> <p>12 A. By description.</p> <p>13 Q. And would you be able to see</p> <p>14 everything else you could search by if that drop</p> <p>15 down worked?</p> <p>16 A. I'm trying to make this one -- if I</p> <p>17 back up for you a second.</p> <p>18 Okay, when you come first into this</p> <p>19 search, it gives you options to search for active</p> <p>20 items by this requesting location or by a specific</p> <p>21 location by the product codes, and there's some</p> <p>22 other ones here, but my scrolling is not working,</p> <p>23 and I really don't know why.</p> <p>24 Q. Okay.</p> <p>25 A. Once I pick a way -- like, a type</p>
<p>126</p> <p>1 universal product code, --</p> <p>2 A. Yes.</p> <p>3 Q. -- items by universal product number?</p> <p>4 A. Yes.</p> <p>5 Q. What are the universal -- what is a</p> <p>6 universal product code; is that a code that's</p> <p>7 associated with each item?</p> <p>8 A. That's the UPC code that's on, like,</p> <p>9 the manufacturer's packaging in the little bar</p> <p>10 code.</p> <p>11 Q. Right.</p> <p>12 And what's the universal product</p> <p>13 number; that's the number associated with each --</p> <p>14 A. That's built into that bar code.</p> <p>15 Q. Right.</p> <p>16 Okay. Is there any sort of hierarchy</p> <p>17 that's used for the universal product numbers to</p> <p>18 define the type of item that the number is</p> <p>19 associated with, similar to the way that the</p> <p>20 UNSPSC code works?</p> <p>21 A. I have no idea.</p> <p>22 Q. Okay. So let's see, again, the</p> <p>23 search fields that are available here.</p> <p>24 Now, we were talking about -- you can</p> <p>25 search by description.</p>	<p>128</p> <p>1 that I want to search by here, so these active</p> <p>2 items at the From location, then I can also search</p> <p>3 based on the item number, the description, and,</p> <p>4 again, I don't know why the drop-downs aren't</p> <p>5 working to tell you what else is under here.</p> <p>6 I was able to hit D, because I knew</p> <p>7 description was there. It must be a problem with</p> <p>8 my laptop, to be honest with you, because I don't</p> <p>9 have a problem on my desktop.</p> <p>10 Q. So you can first do a search for</p> <p>11 particular matching items by location or by</p> <p>12 universal product number or universal code.</p> <p>13 A. Uh-huh.</p> <p>14 Q. And then you can also -- well, let me</p> <p>15 start over.</p> <p>16 You can first select the particular</p> <p>17 items that you want to search using one of those</p> <p>18 methods there. And then you can search among</p> <p>19 whatever you've selected by using, you know, a</p> <p>20 description word or by using text that matches</p> <p>21 up with --</p> <p>22 A. Yes. So you're first picking, how do</p> <p>23 you want to search, you know, by some fields. I'm</p> <p>24 searching by items that are reacted by a certain</p> <p>25 location. Then within those items that fit that</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>129</p> <p>1 initial qualification, am I searching for item</p> <p>2 number, description or something else.</p> <p>3 Q. In that original drop-down menu</p> <p>4 there, do you know if one of the ways that you can</p> <p>5 search is by searching for manufacturer names or</p> <p>6 vendor names?</p> <p>7 A. There's a manufacturer code search,</p> <p>8 there's a manufacturer number search.</p> <p>9 Q. Okay. So you can do it -- you can</p> <p>10 first do a search by manufacturer number --</p> <p>11 A. Manufacturer code or number.</p> <p>12 Q. -- or manufacturer code for a vendor</p> <p>13 item search?</p> <p>14 And then once you've done that</p> <p>15 search, you can search for matching items among</p> <p>16 that manufacturer code?</p> <p>17 A. Right.</p> <p>18 So now that I've picked by the</p> <p>19 manufacturer code, this screen shows me the</p> <p>20 manufacturer's information that's now available</p> <p>21 for me to limit my search on.</p> <p>22 Q. Okay.</p> <p>23 A. Depending on the first item I pick,</p> <p>24 you get different results to then be able to</p> <p>25 search further by.</p>	<p>131</p> <p>1 here?</p> <p>2 A. No, we're -- well, where we started</p> <p>3 was on the requisition creation, so I'm in here</p> <p>4 physically creating this requisition, searching</p> <p>5 for the stuff I want to put on it.</p> <p>6 Q. Okay. So if we selected something</p> <p>7 here, that could be added to the requisition?</p> <p>8 A. Yes. If I selected something here,</p> <p>9 it would pull it into that next line.</p> <p>10 Q. Okay. So it looks like there's</p> <p>11 multiple manufacturer codes here under code; do</p> <p>12 you see that, ABT, ADDT?</p> <p>13 A. Yes.</p> <p>14 Q. And is that showing every</p> <p>15 manufacturer code that's in the system; if you</p> <p>16 scroll down, would it --</p> <p>17 A. It should be, yes.</p> <p>18 Q. Okay. Is there a way to limit it to</p> <p>19 only a particular manufacturer code or codes</p> <p>20 instead of showing every manufacturer code?</p> <p>21 A. If I went in here and searched by</p> <p>22 code -- again, I apologize because the background</p> <p>23 is not working. I'm hitting C to think that it</p> <p>24 would let me search by code. C is not resulting</p> <p>25 anything for me.</p>
<p>130</p> <p>1 Q. Okay. Can we try to do that?</p> <p>2 A. I selected by manufacturer code</p> <p>3 already.</p> <p>4 Q. Okay. And now that we've selected by</p> <p>5 manufacturer code, can we search for, let's say, a</p> <p>6 particular description of an item in that code?</p> <p>7 A. It doesn't look like it's going to</p> <p>8 let me search further by the description. This</p> <p>9 drop-down doesn't work. I'm typing D, hoping it</p> <p>10 will move. It went to division, but it's not</p> <p>11 moving any further to get to description.</p> <p>12 Q. Could we use another --</p> <p>13 A. Item description, okay.</p> <p>14 Q. Okay. So now let's search for</p> <p>15 C-A-T-H, catheter, maybe.</p> <p>16 Okay. So now we're seeing here</p> <p>17 matching items among -- items that match up with</p> <p>18 the C-A-T-H description among the manufacturers</p> <p>19 that you've chosen here, searching by</p> <p>20 manufacturer?</p> <p>21 A. Right.</p> <p>22 Q. Okay. Now, once you select a</p> <p>23 particular item within this list here, is there a</p> <p>24 way to electronically create the requisition for</p> <p>25 that item; is that what we've already gone through</p>	<p>132</p> <p>1 Q. Okay. But you should be able to</p> <p>2 search by manufacturer code here, and that would</p> <p>3 limit it to the manufacturer's codes who match up</p> <p>4 with whatever code you entered?</p> <p>5 MR. GRAHAM: Objection; speculation.</p> <p>6 A. I don't know. I'm typing C, thinking</p> <p>7 code would come up. It's not. So I want to say,</p> <p>8 no, I can't search at this point just by code.</p> <p>9 MR. CLEMENTS: Could you try an</p> <p>10 asterisk? Because I think I remember it was an</p> <p>11 asterisk, then code under that field.</p> <p>12 THE WITNESS: Okay.</p> <p>13 A. So if I said just A-N-G-I, which came</p> <p>14 up first?</p> <p>15 Q. Right.</p> <p>16 A. So, yes, now I'm getting just that</p> <p>17 code.</p> <p>18 Q. So now that you've done that search,</p> <p>19 you have selected items that come from a</p> <p>20 particular manufacturer, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And now that you've limited your</p> <p>23 search result to those items that come from a</p> <p>24 particular manufacturer, you can do a further</p> <p>25 narrowing search within those items for a</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>133</p> <p>1 particular item description? Like, for example,</p> <p>2 you could go into this search result and search</p> <p>3 for C-A-T-H; is that possible?</p> <p>4 A. I can do a multi-step search.</p> <p>5 Q. Okay.</p> <p>6 A. So here, where I have code equals the</p> <p>7 A-N-G-I, I can add something and say, so where the</p> <p>8 code equals this and --</p> <p>9 Q. The description item?</p> <p>10 A. -- the item's description --</p> <p>11 Q. Equals C-A-T-H?</p> <p>12 A. Well, I'm going to say like C-A-T-H.</p> <p>13 Q. Okay.</p> <p>14 A. So now I'm limiting that to just the</p> <p>15 manufacturer code A-N-G-I with CATH and a</p> <p>16 description.</p> <p>17 Q. Okay. If we now go back and do</p> <p>18 another search here for item description equals --</p> <p>19 or like CATH, but we take out the first step in</p> <p>20 the search here --</p> <p>21 A. Item description like CATH, now I</p> <p>22 should have all items with a description of CATH</p> <p>23 in there, regardless of who the manufacturer code</p> <p>24 is.</p> <p>25 Q. Okay. So now we could go in and</p>	<p>135</p> <p>1 MR. STRAPP: Let's go off the record</p> <p>2 for a minute.</p> <p>3 VIDEOGRAPHER: Going off the record</p> <p>4 at 2:42.,</p> <p>5 (Recess.)</p> <p>6 VIDEOGRAPHER: Back on the record at</p> <p>7 2:44.,</p> <p>8 BY MR. STRAPP:</p> <p>9 Q. Okay. Now that we have the item</p> <p>10 description up and we're searching for diaper, can</p> <p>11 you run that search, please?</p> <p>12 Let's select Diapers Huggies, please.</p> <p>13 A. Well, if I select it, it's going to</p> <p>14 try and put it in my requisition.</p> <p>15 Q. Can we do that; is that possible?</p> <p>16 A. No.</p> <p>17 MS. BURKE-ANDERSON: I think maybe</p> <p>18 you need to ask the question, what can you do</p> <p>19 without creating a requisition, because that's, I</p> <p>20 think, where we're getting...</p> <p>21 Q. Okay. So what can you do to show me</p> <p>22 what the Diapers Huggies item would have without</p> <p>23 actually creating the requisition on your live</p> <p>24 system?</p> <p>25 A. You want to see the Item Master</p>
<p>134</p> <p>1 select something with the item description CATH</p> <p>2 that comes from a manufacturer other than A-N-G-I,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And once we did that, we could then</p> <p>6 create the requisition, approve it, submit the</p> <p>7 purchase order?</p> <p>8 A. Yes.</p> <p>9 MR. STRAPP: Why don't we take a</p> <p>10 short break.</p> <p>11 VIDEOGRAPHER: Going off the record.</p> <p>12 The time is 2:31.,</p> <p>13 (Recess.)</p> <p>14 VIDEOGRAPHER: Back on the record.</p> <p>15 The time is 2:41.,</p> <p>16 BY MR. STRAPP:</p> <p>17 Q. Could we go into the requisition</p> <p>18 module that you already have up on the screen and</p> <p>19 do a search by item description?</p> <p>20 A. What description?</p> <p>21 Q. Diapers again.</p> <p>22 MR. CLEMENTS: Could you stop for</p> <p>23 just a moment? Sorry, it looks like the host has</p> <p>24 been switched back to Kevin again, so I'm not</p> <p>25 getting your screen anymore.</p>	<p>136</p> <p>1 set-up for the Diapers Huggies?</p> <p>2 Q. Yes, let's see that.</p> <p>3 A. I can show you that.</p> <p>4 I'm just going to write this item</p> <p>5 number down.</p> <p>6 Q. And let me ask you one more question,</p> <p>7 if we went into the test system, would you be able</p> <p>8 to do what you're doing here on the live system</p> <p>9 and actually create the requisition the same way</p> <p>10 that you're doing it here -- showing me how it</p> <p>11 could be done here?</p> <p>12 A. Well, we tried that once and it</p> <p>13 didn't work out too well. I can go back and try</p> <p>14 again, but if you're wanting to see what the</p> <p>15 information is about the item, let me show you the</p> <p>16 Item Master record, see if that answers your</p> <p>17 question; if not, I'll go back into test and try</p> <p>18 and make one for you.</p> <p>19 Q. Okay.</p> <p>20 A. So IC11 is our Item Master set-up.</p> <p>21 Now, here, like I could do on the</p> <p>22 other screen, I can search by item. So this is</p> <p>23 the same search that we just had. And I'll go</p> <p>24 back and I'll look for the description, like</p> <p>25 diaper.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>137</p> <p>1 I now select that same one, Huggies</p> <p>2 Diaper.</p> <p>3 Q. Okay.</p> <p>4 A. And if I inquire, now this is the</p> <p>5 information I have set up in the Item Master for</p> <p>6 that particular item.</p> <p>7 Q. Does it have a vendor name in here?</p> <p>8 A. In this screen set-up, you don't tie</p> <p>9 this item to the vendor. If I drill around on</p> <p>10 this item, I can probably see the vendor that it's</p> <p>11 tied to.</p> <p>12 Here I have PO vendor items and I can</p> <p>13 see that it's tied to this vendor, School Health</p> <p>14 Corporation.</p> <p>15 Q. Okay. Now, can we go back to the</p> <p>16 result that gave us a list of items with diaper as</p> <p>17 the description?</p> <p>18 A. Okay. So that's the list.</p> <p>19 Q. And let's select Diapers Goodnites</p> <p>20 use -- yeah, 1439006.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. The manufacturer name here is</p> <p>23 Kimberly Clark.</p> <p>24 Can we drill around to see additional</p> <p>25 vendor name information?</p>	<p>139</p> <p>1 Q. Right.</p> <p>2 A. -- and secondary by description?</p> <p>3 Q. Well, let's just do a search first</p> <p>4 by --</p> <p>5 A. The code?</p> <p>6 Q. -- the code.</p> <p>7 A. What code?</p> <p>8 Q. Let's use -- is P&G a code, do you</p> <p>9 know? Do you want to try it and see if it works?</p> <p>10 A. I think it was just PG.</p> <p>11 Q. Just PG.</p> <p>12 A. No.</p> <p>13 Q. Let's try -- is it P&G?</p> <p>14 A. No, I did P asterisk. I can go back</p> <p>15 and do the P&G, if you want, specifically.</p> <p>16 Q. I want to see whether there's any --</p> <p>17 what I'm looking for here is whether there's any</p> <p>18 items in here that are exactly the same item from</p> <p>19 the same manufacturer, but available from two</p> <p>20 vendors or more than two vendors; in other words,</p> <p>21 is there, for example, diapers from Procter &</p> <p>22 Gamble -- the same sized diaper carried by two</p> <p>23 different vendors here?</p> <p>24 It doesn't look like there is here,</p> <p>25 at least for Procter & Gamble. It looks like</p>
<p>138</p> <p>1 A. Here, this item is tied to Owens &</p> <p>2 Minor.</p> <p>3 Q. Okay. Now, let's go back to the</p> <p>4 requisition module that you had open a few minutes</p> <p>5 ago.</p> <p>6 Can you do a search by manufacturer</p> <p>7 code?</p> <p>8 A. I'm not sure what you're wanting me</p> <p>9 to look at. I don't know if this is the right</p> <p>10 place to look for it.</p> <p>11 Q. I want you to -- let's say, pull up</p> <p>12 all items that include Procter & Gamble as the</p> <p>13 manufacturer.</p> <p>14 A. Okay. So I want to go back to the IC</p> <p>15 set-up, and here are my items.</p> <p>16 You want me to search by</p> <p>17 manufacturer, and here I can't search by</p> <p>18 manufacturer.</p> <p>19 Q. So could we try to do it through the</p> <p>20 requisition?</p> <p>21 A. Uh-huh.</p> <p>22 You said manufacturer name?</p> <p>23 Q. Let's do manufacturer code.</p> <p>24 A. Okay. Primary search by manufacturer</p> <p>25 code --</p>	<p>140</p> <p>1 they're each different ones, but maybe if we do a</p> <p>2 different -- search by different -- maybe if we do</p> <p>3 a search by all manufacturer codes and just scroll</p> <p>4 down and see whether any of the item descriptions</p> <p>5 are identical, but yet have the same manufacturer</p> <p>6 code, that could sort of show us if you're</p> <p>7 carrying the same product by the same</p> <p>8 manufacturer, but you're just carrying it from two</p> <p>9 different vendors.</p> <p>10 So let's just take out the P asterisk</p> <p>11 there and sort it by manufacturer code, just all</p> <p>12 active items by manufacturer code.</p> <p>13 A. Okay, so this is all items by</p> <p>14 manufacturer code.</p> <p>15 Q. Okay. But isn't this just limited to</p> <p>16 the P asterisk?</p> <p>17 A. So now we're back to this.</p> <p>18 Q. Okay. So -- like, for example, it</p> <p>19 looks like the item description for -- well, those</p> <p>20 are all slightly different, but I'm wondering if</p> <p>21 any of these item descriptions are identical.</p> <p>22 Can we scroll down here and see the</p> <p>23 next down at the bottom there.</p> <p>24 All right. Let's keep on scrolling.</p> <p>25 This might be a feudal search here, but just a</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>141</p> <p>1 little further.</p> <p>2 All right. Let's call a halt to</p> <p>3 this.</p> <p>4 MR. STRAPP: Can we take a break for</p> <p>5 just a couple of minutes, please?</p> <p>6 VIDEOGRAPHER: Going off the record</p> <p>7 at 2:53.,</p> <p>8 (Recess.)</p> <p>9 VIDEOGRAPHER: Back on the record at</p> <p>10 2:53.,</p> <p>11 BY MR. STRAPP:</p> <p>12 Q. Ms. Cimino, thank you for your time</p> <p>13 and cooperation and assistance. I appreciate it.</p> <p>14 We have no further questions at this time.</p> <p>15 MR. GRAHAM: I just have a few</p> <p>16 questions. I'll try to keep it brief.</p> <p>17 EXAMINATION BY MR. GRAHAM:</p> <p>18 Q. Can we -- so looking at the screen</p> <p>19 we're at right here, this is RQ10.</p> <p>20 Can you click on the search button.</p> <p>21 And this is the search that we've</p> <p>22 been using today?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So when you add -- when you</p> <p>25 hit the plus sign over on the right side, that</p>	<p>143</p> <p>1 Q. And can you hit the add?</p> <p>2 A. To add the other search lines?</p> <p>3 Q. Yeah, I think so.</p> <p>4 A. Okay.</p> <p>5 Q. And then do an item description.</p> <p>6 And diaper, we've been using that</p> <p>7 one.</p> <p>8 Okay. Now, this time, when you click</p> <p>9 filter, it's still going to look through all the</p> <p>10 active items, but now it's going to search for two</p> <p>11 criteria?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So it's still searching all</p> <p>14 the active items in the Item Master?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. It's not just searching the</p> <p>17 ones that popped up on P&G, it's still searching</p> <p>18 the entire Item Master?</p> <p>19 A. As far as I know. I mean, it should.</p> <p>20 Q. Thank you.</p> <p>21 Now, South Jersey upgraded its Lawson</p> <p>22 System in April of 2008?</p> <p>23 A. April of 2008 is when we signed the</p> <p>24 contracts.</p> <p>25 Q. Okay. And you had an existing system</p>
<p>142</p> <p>1 adds an additional level -- an additional criteria</p> <p>2 to filter through, right?</p> <p>3 A. Yes, additional search options.</p> <p>4 Q. Now, can you subtract that one?</p> <p>5 And go head and put in P&G in there.</p> <p>6 So these are all the items from the</p> <p>7 Item Master that have the P&G code; is that</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. And when you did this search, do you</p> <p>11 know if it went through the entire -- searched the</p> <p>12 entire Item Master to find these results?</p> <p>13 A. It was searching active items in the</p> <p>14 Item Master.</p> <p>15 Q. And what are active items versus</p> <p>16 nonactive items?</p> <p>17 A. In our Item Master, we can designate</p> <p>18 that this is an active item or an inactive item.</p> <p>19 So if we had it in there and we don't intend to</p> <p>20 use it, we would make it inactive.</p> <p>21 Q. Okay. So this would be all the</p> <p>22 active items that have the P&G code next to it?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Can you click on search again?</p> <p>25 A. Yes.</p>	<p>144</p> <p>1 at that time -- an existing Lawson System at that</p> <p>2 time?</p> <p>3 A. For materials only, yes.</p> <p>4 Q. And materials would be the</p> <p>5 procurement?</p> <p>6 A. Procurement, inventory.</p> <p>7 Q. Do you recall when you originally</p> <p>8 licensed that older system?</p> <p>9 A. No. I mean, we've had that for</p> <p>10 years.</p> <p>11 Q. Would it be before 1995?</p> <p>12 A. I think yes.</p> <p>13 Q. Now, walking through the installation</p> <p>14 a little bit, you testified that the actual</p> <p>15 installation of the upgrade was done by a third</p> <p>16 party vendor?</p> <p>17 A. Yes.</p> <p>18 Q. Blue Horseshoe; is that correct?</p> <p>19 A. Blue Horseshoe.</p> <p>20 Q. After Blue Horseshoe had installed</p> <p>21 the system, were there any items in the Item</p> <p>22 Master of the upgraded system?</p> <p>23 A. From the brand new install?</p> <p>24 Q. Yes.</p> <p>25 A. No.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>145</p> <p>1 Q. Okay. And did Blue Horseshoe also</p> <p>2 help you install requisition self-service?</p> <p>3 A. Yes, I believe so.</p> <p>4 Q. And then another non-Lawson</p> <p>5 consultant helped you to customize it?</p> <p>6 A. Yes.</p> <p>7 Q. To get the work flow customization?</p> <p>8 A. Yes.</p> <p>9 Q. Now, you testified that each year</p> <p>10 South Jersey has to pay a maintenance fee; is that</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. Do you also have to pay a license</p> <p>14 fee?</p> <p>15 A. No.</p> <p>16 Q. So if you stopped paying the</p> <p>17 maintenance fee, you could still continue using</p> <p>18 the system as it stands?</p> <p>19 A. That's my understanding.</p> <p>20 Q. And then you also have paid for</p> <p>21 services from Lawson?</p> <p>22 A. We had, yes.</p> <p>23 Q. And you testified that you used</p> <p>24 service tickets; is that right?</p> <p>25 How do you request services from</p>	<p>147</p> <p>1 Q. Is that different than the service</p> <p>2 ticket?</p> <p>3 A. No, that's kind of how they work the</p> <p>4 service ticket.</p> <p>5 Q. Okay. And that would be the same for</p> <p>6 the WebEx sessions?</p> <p>7 A. Yes. You would initiate the request</p> <p>8 initially and it would go interactive and then</p> <p>9 there may be a phone call or there may be a WebEx</p> <p>10 session to walk through the problem you're having.</p> <p>11 Q. So those are ways to correct the</p> <p>12 problem you're having or help you walk through it?</p> <p>13 A. Yeah, or to get support.</p> <p>14 Q. Can you take a look at Exhibit South</p> <p>15 Jersey 4?</p> <p>16 MR. STRAPP: Josh, I don't mean to</p> <p>17 interrupt, but if you're done with the</p> <p>18 demonstration, we can close out.</p> <p>19 Q. Let's hold on to that, South Jersey</p> <p>20 4, for a second.</p> <p>21 I have just a couple more questions</p> <p>22 on this.</p> <p>23 Can you log back into the Requisition</p> <p>24 Self-Service site, go out of production into the</p> <p>25 test.</p>
<p>146</p> <p>1 Lawson?</p> <p>2 A. Well, the tickets I think you're</p> <p>3 referring to are, when we have problems, we put a</p> <p>4 support ticket in for assistance. If I want to</p> <p>5 purchase additional services, I would contact my</p> <p>6 account manager and ask for a quote.</p> <p>7 Q. How many of those specific service</p> <p>8 tickets do you put in on a new system?</p> <p>9 A. How many?</p> <p>10 Q. Yes.</p> <p>11 A. A few hundred.</p> <p>12 Q. A few hundred.</p> <p>13 Do you -- and that would include not</p> <p>14 only the procurement side, but also the human</p> <p>15 resources and the financial?</p> <p>16 A. Yes.</p> <p>17 Q. Do you know approximately what</p> <p>18 percent were related to the procurement?</p> <p>19 A. Not offhand.</p> <p>20 Q. Would it be significantly more or</p> <p>21 less than from human resources or financial?</p> <p>22 A. I wouldn't hedge a guess.</p> <p>23 Q. And you also testified that you had</p> <p>24 some interactive web support?</p> <p>25 A. Yes.</p>	<p>148</p> <p>1 Okay. Can you do the Find/Shop,</p> <p>2 Search Catalog and do a search for Lotion.</p> <p>3 Can you add 1424153.</p> <p>4 And also add 1030 -- yes, that one</p> <p>5 right there. That would be Item No. 1030363.</p> <p>6 From the description you see on my</p> <p>7 cart, the description of each item --</p> <p>8 (Interruption.)</p> <p>9 VIDEOGRAPHER: Going off the record</p> <p>10 at 3:01.,</p> <p>11 (Off the record.)</p> <p>12 VIDEOGRAPHER: Back on the record at</p> <p>13 3:02.,</p> <p>14 BY MR. GRAHAM:</p> <p>15 Q. Pardon the interruption.</p> <p>16 From the description under My Cart</p> <p>17 for each of the items, is there any way to tell</p> <p>18 what this lotion is used for?</p> <p>19 A. Well, looking at cleansing, I would</p> <p>20 think that that would be more of a cleaning-type</p> <p>21 lotion compared to just a regular hand and body</p> <p>22 lotion, but to know what it's truly used for, no.</p> <p>23 Q. So from these descriptions, you can't</p> <p>24 tell if one could be switched for the other one to</p> <p>25 an enduser?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>149</p> <p>1 A. To a nonclinical enduser, no.</p> <p>2 Q. Okay. You can -- can you delete</p> <p>3 those.</p> <p>4 And can you do a search for diaper.</p> <p>5 And can you add number 1430969.</p> <p>6 And can you also add 1439010.</p> <p>7 A. Okay.</p> <p>8 Q. So, again, from the description here,</p> <p>9 you wouldn't be able to tell if these diapers were</p> <p>10 the same size?</p> <p>11 A. Not from the description.</p> <p>12 Q. Okay. So there's no indication that</p> <p>13 one can be used as a replacement for the other?</p> <p>14 A. The fact that one doesn't say what</p> <p>15 size it is and one does would lead me to believe</p> <p>16 that they couldn't be interchanged, but, no, I</p> <p>17 couldn't be sure of that.</p> <p>18 Q. Thank you.</p> <p>19 MR. GRAHAM: I'm done with the --</p> <p>20 MR. STRAPP: Okay. Do you want to go</p> <p>21 off the record for a minute and just close it</p> <p>22 down?</p> <p>23 MR. GRAHAM: Sure. Let's go off the</p> <p>24 record and close it down.</p> <p>25 VIDEOGRAPHER: Going off the record</p>	<p>151</p> <p>1 A. Correct.</p> <p>2 Q. And why doesn't it use those</p> <p>3 functions?</p> <p>4 A. I think that's our discussion -- our</p> <p>5 issue here. We don't want to have multiple item</p> <p>6 numbers for the same item.</p> <p>7 Q. And why not?</p> <p>8 A. I couldn't speak to that logic. I</p> <p>9 disagree with it personally, so...</p> <p>10 Q. There were also some questions about</p> <p>11 the ability of the Lawson System to associate one</p> <p>12 item in the Item Master with multiple vendors?</p> <p>13 A. Yes.</p> <p>14 Q. Does South Jersey actually do that?</p> <p>15 A. Yes.</p> <p>16 Q. And how does it decide which items to</p> <p>17 associate with multiple vendors?</p> <p>18 A. I guess whoever we have contracts</p> <p>19 with to get that item.</p> <p>20 Q. And then one of those vendors would</p> <p>21 be a default vendor?</p> <p>22 A. I would say yes, although I don't</p> <p>23 recall seeing any default order where you assign</p> <p>24 the vendors to the item.</p> <p>25 Q. Now, discussing the purchase order</p>
<p>150</p> <p>1 at 3:04.,</p> <p>2 (Off the record.)</p> <p>3 VIDEOGRAPHER: Back on the record at</p> <p>4 3:06.,</p> <p>5 BY MR. GRAHAM:</p> <p>6 Q. I had a couple of questions about the</p> <p>7 ORMIS System.</p> <p>8 And that interfaces with the Lawson</p> <p>9 System; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. I believe you testified that certain</p> <p>12 parts of the Item Master are sent over to ORMIS?</p> <p>13 A. Yes.</p> <p>14 Q. What does ORMIS do with those items?</p> <p>15 A. They take the item number and the</p> <p>16 cost information to go with it for billing for the</p> <p>17 patient, the cases that they're using those items</p> <p>18 in, to be able to bill for it.</p> <p>19 Q. What does ORMIS send back to Lawson?</p> <p>20 A. Nothing.</p> <p>21 Q. A few questions about the substitute</p> <p>22 replacement items.</p> <p>23 You testified that South Jersey does</p> <p>24 not use the substitute replacement in inventory</p> <p>25 control?</p>	<p>152</p> <p>1 process a little bit, you testified when a</p> <p>2 purchase order goes out, that South Jersey -- a</p> <p>3 purchase order for a nonstock item goes out to a</p> <p>4 vendor, the vendor will send a confirmation back</p> <p>5 to South Jersey?</p> <p>6 A. Yes.</p> <p>7 Q. And that confirmation is not put into</p> <p>8 the Lawson System?</p> <p>9 A. Correct.</p> <p>10 Q. So there's no way in the Lawson</p> <p>11 System to determine whether or not South Jersey</p> <p>12 has received a confirmation?</p> <p>13 A. Correct.</p> <p>14 Q. Thank you, Ms. Cimino. That's all my</p> <p>15 questions.</p> <p>16 MR. STRAPP: I just have a couple</p> <p>17 more questions.</p> <p>18 FURTHER EXAMINATION BY MR. STRAPP:</p> <p>19 Q. Ms. Cimino, you just testified that</p> <p>20 South Jersey does have, in its Item Master,</p> <p>21 particular items that have multiple vendors?</p> <p>22 A. Yes.</p> <p>23 Q. So, for example, you might have,</p> <p>24 let's say, for example, the diaper size 6 from</p> <p>25 Huggies that's available from one vendor and also</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>153</p> <p>1 available from a second vendor, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Now, is it possible, then, to do a</p> <p>4 search in the requisition module that we were</p> <p>5 looking at, whereby you search for diapers, you</p> <p>6 pull up the Huggies diaper, size 6, and then you</p> <p>7 can select it from the first vendor and request</p> <p>8 a -- and create a requisition and then select it</p> <p>9 from the second vendor and create a requisition</p> <p>10 also from that second vendor?</p> <p>11 A. When we're selecting the item to the</p> <p>12 requisition, it's defaulting to a vendor. In that</p> <p>13 case, I don't believe we had multiple vendors tied</p> <p>14 to it, so we have to really pick the item that had</p> <p>15 the multiple vendors. I don't know which one</p> <p>16 would default in that case.</p> <p>17 Q. But if you had an item with multiple</p> <p>18 vendors, which you said you did, --</p> <p>19 A. Yes.</p> <p>20 Q. -- and you found that item in the</p> <p>21 Item Master, --</p> <p>22 A. Yes.</p> <p>23 Q. -- you could select -- create a</p> <p>24 requisition from the first vendor and then you</p> <p>25 could create a requisition from the second vendor</p>	<p>155</p> <p>1 Cimino. The time is 3:13. Going off the record.</p> <p>2 (The following statement was made off</p> <p>3 the video record.)</p> <p>4 MR. STRAPP: I'd like to note on the</p> <p>5 record that the demonstration provided today by</p> <p>6 Ms. Cimino of the Lawson System was recorded and</p> <p>7 that the recording of that demonstration will be</p> <p>8 marked as Exhibit 11, South Jersey Exhibit 11 to</p> <p>9 this deposition.</p> <p>10 (Exhibit South Jersey 11 was received</p> <p>11 and marked for identification and retained in the</p> <p>12 computer by Mr. Clements.)</p> <p>13 (TIME NOTED: 3:14 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>154</p> <p>1 for the same item, correct?</p> <p>2 A. Yes. One would default. I would</p> <p>3 have to override it to the second. But could I</p> <p>4 order ultimately from both vendors, yes.</p> <p>5 MR. STRAPP: I have no further</p> <p>6 questions.</p> <p>7 MR. GRAHAM: Just one follow-up</p> <p>8 question, sorry.</p> <p>9 FURTHER EXAMINATION BY MR. GRAHAM:</p> <p>10 Q. Is there a way to determine, in the</p> <p>11 system, which items have multiple vendors attached</p> <p>12 to them by doing a search?</p> <p>13 A. Not that I can think of.</p> <p>14 Q. So I would have to know -- how would</p> <p>15 you know which item had two vendors in order to do</p> <p>16 the situation that Mr. Strapp suggested?</p> <p>17 A. I could find it other ways, but not</p> <p>18 through the Lawson search. I mean, I could query</p> <p>19 the database directly looking for certain codes or</p> <p>20 multiple records and come back to that, so</p> <p>21 wouldn't necessarily have to, but as an enduser,</p> <p>22 yeah, I would kind of have to know.</p> <p>23 Q. Thank you.</p> <p>24 VIDEOGRAPHER: This concludes the</p> <p>25 deposition, Volume 1, Videotape No. 3, of Lynn</p>	<p>156</p> <p>1 WITNESS'S CERTIFICATION</p> <p>2</p> <p>3 _____</p> <p>4 LYNN S. CIMINO</p> <p>5</p> <p>6 On _____, 2010, the foregoing</p> <p>7 deposition was submitted to LYNN S. CIMINO, the</p> <p>8 witness, taken on Tuesday, March 2, 2010, for her</p> <p>9 examination.</p> <p>10 At which time the deposition was read by the</p> <p>11 witness and any proposed changes desired were</p> <p>12 subsequently entered upon the attached errata</p> <p>13 sheet.</p> <p>14 Thereafter, the deposition was duly witnessed</p> <p>15 and signed by:</p> <p>16</p> <p>17 _____</p> <p>18 Notary Public in and for the</p> <p>19 County of _____</p> <p>20 State of _____</p> <p>21</p> <p>22</p> <p>23</p> <p>24 _____</p> <p>25 My Commission Expires</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

1	ERRATA SHEET	157
2		
3	WITNESS'S NAME _____	
4	DATE OF DEPOSITION _____	
5	CASE NAME _____	
6		
7	PAGE LINE CORRECTION	
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1	CERTIFICATE	158
2	I, ELIZABETH M. KONDOR, a Certified Court	
3	Reporter, No. 30XI00117200, Certified LiveNote	
4	Reporter, No. 060907-14 and Notary Public of the	
5	State of New Jersey, do hereby certify that prior	
6	to the commencement of the examination, LYNN S.	
7	CIMINO was duly sworn by me to testify the truth,	
8	the whole truth and nothing but the truth.	
9	I DO FURTHER CERTIFY that the foregoing	
10	is a true and accurate transcript of the testimony	
11	as taken stenographically by and before me at the	
12	time, place and on the date hereinbefore set	
13	forth.	
14	I DO FURTHER CERTIFY that I am neither a	
15	relative nor employee nor attorney nor counsel of	
16	any of the parties to this action, and that I am	
17	neither a relative nor employee of such attorney	
18	or counsel, and that I am not financially	
19	interested in the action.	
20		
21	_____	
22	Notary Public of the State of New Jersey	
23	My Commission expires June 6, 2010.	
24		
25	Dated: Tuesday, March 9, 2010	

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND
REVISED SUMMARY OF THE DEPOSITION OF LYNN S. CIMINO**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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